



# EXMOOR

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## NATIONAL PARK

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23 June 2022

### EXMOOR NATIONAL PARK AUTHORITY

**To: All Members of the Exmoor National Park Authority**

A meeting of the Exmoor National Park Authority will be held in the **Committee Room, Exmoor House, Dulverton** on **Tuesday, 5 July 2022 at 10.00am.**

**Please Note:** The Authority is currently trialling a new meeting format to better manage Authority business, so Agenda items relating to the Authority's role as sole **local planning authority** for the National Park area, including determination of planning applications, will commence at **1.00 pm.**

The meeting will be open to the press and public subject to the passing of any resolution under s.100(A)(4) of the Local Government Act 1972.

There is Public Speaking at this meeting, when the Chairperson will allow members of the public two minutes each to ask questions, make statements, or present a petition relating to any item relevant to the business of the Authority or relating to any item on the Agenda. Anyone wishing to ask questions should notify the Corporate Support Officer as soon as possible, or at the latest by 4pm on the working day before the meeting of the agenda item on which they wish to speak, indicating a brief summary of the matter or matters to be raised (contact Judy Coles on 01398 322250 or email [jcoles@exmoor-nationalpark.gov.uk](mailto:jcoles@exmoor-nationalpark.gov.uk)).

The meeting will be **recorded**. By entering the Authority's Committee Room and speaking during Public Speaking you are consenting to being recorded. We will make the recording available via our website for members of the public to listen to and/or view, within 72 hours of the meeting taking place.

Members of the public may use Facebook and Twitter or other forms of social media to report on proceedings at this meeting. Anyone wishing to film part or all of the proceedings may do so unless the press and public are excluded for that part of the meeting or there is good reason not to do so. As a matter of courtesy, anyone wishing to film proceedings is asked to advise the Chairperson so that those present may be made aware.

(The agenda and papers for this meeting can be downloaded from the National Park Authority's website [www.exmoor-nationalpark.gov.uk](http://www.exmoor-nationalpark.gov.uk)).

Sarah Bryan  
Chief Executive

## **A G E N D A**

The meeting will be chaired by Mr R Milton, Chairperson of the Authority.

### **1. Apologies for Absence**

### **2. Declarations of Interest/Lobbying of Members/Unaccompanied Site Visits**

Members are asked to declare:-

- (1) any interests they may have in relation to items on the agenda for this meeting;
- (2) any lobbying by anyone concerned with a planning application and any unaccompanied site visits where contact has been made with any person concerned with a planning application.

(NB. When verbally making these declarations, members are also asked to complete the Disclosures at Meetings form – attached for members only).

### **3. Chairperson's Announcements**

- 4. Minutes**
  - (1) To approve as a correct record the Minutes of the meetings of the Authority held on 14 June 2022 (Item 4)
  - (2) To consider any Matters Arising from those Minutes.

- 5. Public Speaking:** The Chairperson will allow members of the public to ask questions, make statements, or present a petition. Questions of a general nature relevant to the business of the Authority can be asked under this agenda item. Any questions specific to an agenda item can be posed when that item is considered subject to the discretion of the person presiding at the meeting.

- 6. Internal Audit Arrangements:** To consider the report of the Chief Finance Officer (Item 6)

### **7. 2021/22 Outturn – Budget Performance and Reserves:**

- (1) To consider the report of the Chief Finance Officer on the 2021/22 Outturn - Budget Performance, Reserves, New Year Monitoring and MTFP Update (Item 7.1)
- (2) To consider the report of the Chief Finance Officer on the 2021/22 Outturn - Statement of Accounts (Item 7.2)

- 8. Annual Treasury Management Report:** To consider the report of the Head of Finance and Operations (Item 8)

- 9. Members' Allowances Scheme:** To consider the report of the Chief Finance Officer (Item 9)

- 10. Exmoor Consultative and Parish Forum:** To receive and note the meeting notes from the Exmoor Consultative and Parish Forum held on 17 March 2022 (Item 10)

### **11. Personnel Update**

#### **Leavers**

29/06/2022 - Josephine Bradford – Funding and Project Development Officer – resignation

01/07/2022 – Ailsa Stevens – Communications Officer – resignation

#### **Starters**

06/07/2022 – Robin Offer – Treescapes Officer (2-year fixed term contract)

15/08/2022 – Andrew Lawes – Rural Surveyor

## 12. Any Other Business of Urgency

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**Agenda items relating to the Authority's role as sole local planning authority for the National Park area including determination of planning applications.** This section of the meeting will be chaired by Mr S J Pugsley, Deputy Chairperson (Planning). If the Deputy Chairperson (Planning) is absent, the Deputy Chairperson of the Authority shall be preside.

**13. Development Management:** To consider the report of the Head of Planning and Sustainable Development on the following:-

<b>Agenda Item</b>	<b>Application No.</b>	<b>Description</b>	<b>Page Nos.</b>
13.1	62/41/21/024	Proposed demolition of existing former care home and erection of 9 no. dwelling houses – Lydiate Lodge, Rock Lodge Park, Lynton, EX35 6DN	1 – 26
13.2	6/35/22/101	Proposed storage of timber and wood chipping operation used in connection with the applicant's existing combined heat and power generating business on land form part of the parking area previously granted planning permission (6/35/08/101) for the nearby equestrian course. Resubmission of application 6/35/21/103. (Part retrospective) – Land adjoining B3224 at Treborough Common – Easting 300250: Northing 135050, Treborough, Watchet	1 – 14
13.3	62/11/22/008	Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for the Proposed Establishment of England Coast Path – Glenthorne, The Towers, Road From County Gate To Wellfield, Brendon, Devon, EX35 6NQ	1 – 14
13.4	62/41/22/023	Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for advertisement consent for the proposed installation of 5 no signs (x1 entrance sign, x1 information board, x1 disabled parking sign and x2 payment signage signs). Amended description – Picnic Site and Car Park, Valley of Rocks, Lynton, EX35 6JH	1 – 10
13.5	62/41/22/024	Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for advertisement consent for the proposed replacement of external and window signage – Exmoor National Park Information Centre, The Esplanade, Lynmouth, EX35 6EQ	1 – 10
13.6	6/10/22/111	Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for advertisement consent for the proposed replacement of external and window signage – Exmoor National Park Information Centre, Dunster Steep, Dunster, Minehead, TA24 6SE	1 – 10
13.7	6/9/22/104	Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for advertisement consent for the proposed replacement of external and window signage - Exmoor National Park Information Centre, 7-9 Fore Street, Dulverton, TA22 9EX	1 - 8

- 14. Application Decisions Delegated to the Chief Executive:** To note the applications determined by the Chief Executive under delegated powers (Item 14).
- 15. Site Visits:** To arrange any site visits agreed by the Committee (the reserve date being Friday, 29 July 2022 (am)).

Further information on any of the reports can be obtained by contacting the National Park Authority at the address and telephone numbers at the top of the agenda. Details of the decisions taken at this meeting will be set out in the formal Minutes which the Committee will be asked to approve as a correct record at its next meeting. In the meantime, details of the decisions can be obtained from Judy Coles, Corporate Support Officer, at Exmoor House.

## ITEM 4

### EXMOOR NATIONAL PARK AUTHORITY

**MINUTES** of the Meeting of the Exmoor National Park Authority held on Tuesday, 14 June 2022 at 10.00am in the Committee Room, Exmoor House, Dulverton.

#### PRESENT

Mr R Milton (Chairperson)  
Miss A V Davis (Deputy Chairperson)  
Mr S J Pugsley (Deputy Chairperson (Planning))

Mrs L Blanchard	Mr E Ley
Mr M Ellicott	Mr A Milne
Mr D Elson	Mrs F Nicholson
Mr S Griffiths	Mr N Thwaites
Mr J Holtom	Dr S Warren
Dr M Kelly	Mr V White
Mr M Kravis	Mr J Yabsley
Mrs C Lawrence	

Apologies for absence were received from Mr J Patrinos, Mrs F Smith, Miss E Stacey and Mrs P Webber

- 1. ELECTION OF CHAIRPERSON:** Mr R Milton was re-elected as Chairperson of the Authority for the ensuing year.
- 2. ELECTION OF DEPUTY CHAIRPERSON:** Miss A V Davis was re-elected as Deputy Chairperson of the Authority for the ensuing year
- 3. ELECTION OF DEPUTY CHAIRPERSON (PLANNING):** Mr S J Pugsley was re-elected as Deputy Chairperson (Planning) of the Authority for the ensuing year.
- 4. DECLARATIONS OF INTEREST:** There were no declarations of interest.
- 5. CHAIRPERSON'S ANNOUNCEMENTS:**
  - The Society of National Parks Staff conference had taken place on Exmoor over the weekend of 20 - 22 May 2022. The event was attended by staff from all of the UK National Parks, save for the Cairngorms NPA. Thanks were given to Ceri Rapsey and Tom Thurlow for all their work in arranging this very successful event, which was held at Nettlecombe Court and showcased Exmoor at its best.
  - The meeting noted changes to the Authority's membership following the recent Local Elections

#### **New Members**

- Mr Steve Griffiths was welcomed to his first meeting as a Somerset West & Taunton appointed Member
- Mrs Fran Smith was a new Somerset County Council appointed Member but was unable to attend the meeting

### **Change of representation**

- Mr Marcus Kravis was now a Member representing Somerset County Council rather than Somerset West and Taunton Council

### **Departing Members**

- Mr James Hunt and Mr Bill Revans, who had both served on the Authority since 1 April 2017, were no longer Somerset County Council appointees.

### **Continuing Somerset Members**

- **Somerset West & Taunton:** Andy Milne, Steven Pugsley, Nick Thwaites
- **Somerset County Council:** Christine Lawrence, Frances Nicholson
- **Somerset Parish Councillors:** Mike Ellicott, Penny Webber, Vivian White

## **6. MINUTES**

- Confirmation:** The [Minutes](#) of the Authority's meeting held on 3 May 2022 were agreed and signed as a correct record.

- Matters arising:**

In relation to Minute 156, the Leadership Team had considered the recommendations of the External Auditor's from the Value for Money review which was presented to the May Authority meeting.

Leadership Team suggested that the ideal point for undertaking the self-assessment exercise would be at the Standards Committee, alongside the Annual Review of Governance. This had been agreed with the auditors. Benchmarking data would be presented to the Authority alongside other performance data with the Corporate Plan reporting.

## **7. PUBLIC SPEAKING:** Mr R Foxwell, Local Resident

## **8. EXTERNAL AUDIT PLAN FOR THE YEAR ENDING 31 MARCH 2022**

The Authority considered the [report](#) of the Chief Finance Officer

### **The Authority's Consideration**

Mr Gareth Mills and Mr Liam Royle from Grant Thornton joined the meeting remotely via Microsoft Teams to present the External Audit Plan for the year ending 31 March 2022.

<b>RESOLVED:</b> To receive the report and associated appendices.
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## **9. EXMOOR NATIONAL PARK AUTHORITY LOCAL PLAN REVIEW**

The Authority considered the [report](#) of the Head of Strategy and Performance

### **The Authority's Consideration**

The Deputy Chairperson (Planning) noted that the Planning Policy Advisory Group (PPAG) had held a series of robust meetings over recent months in which they systematically worked through all the different elements of the review process, to determine whether a full scale review of the Local Plan was required. It was the

conclusion of the PPAG that on balance, having considered all the evidence presented, a review was not required and that the plan and policies continued to be effective at the current time.

However, the Planning Policy Advisory Group felt strongly that the Authority did need to undertake further work to address some of the concerns raised by the local community during the review process. This work would include the provision of additional guidance and support designed to assist with better interpretation of the Plan, and to highlight pathways to enable applicants and other users to better negotiate their way through the planning process.

The Authority Committee understood that any supplementary guidance could not be contrary to the policies or supporting text contained within the Local Plan. The additional guidance would sit beneath the Plan to provide clarity and assist in those challenging cases where further guidance might help both applicants and decision makers to better interpret the plan and its policies.

Members considered it was essential for the Planning Policy Advisory Group to continue to meet on a regular basis in order to keep this supplementary guidance under constant review.

Consequently, it was proposed and seconded that amendments should be made to the recommendations contained within the report, namely to expand on the wording for Recommendation 2 and to add a new Recommendation 4, to ensure that the Committee's requests were formally captured. In addition, Members looked forward to receiving details of the proposed programme of further work at the August Authority meeting.

**RESOLVED:**

- (1) To note the results of the five-year policy check of the Local Plan.
- (2) To agree with the conclusions of the policy check that a review of the Local Plan is not required but accept that concerns raised need to be addressed.
- (3) To agree to progress work to address points raised during the review through additional guidance, communications and partnership working (as set out in Section 4).
- (4) To agree that the Planning Policy Advisory Group should meet regularly to review and consider updates and supplements to the guidance as necessary.

The meeting closed for recess at 11.25 am and reconvened at 11.40 am

## **10. ANNUAL APPOINTMENTS**

The Authority considered the [report](#) of the Head of Strategy and Performance

### **The Authority's Consideration**

The Committee noted that several of the partnership boards and working groups were oversubscribed and, in the case of the Standards Committee and Simonsbath Steering Group, a volunteer to stand down from each group was received.

For groups that were undersubscribed, additional Members volunteered to sit on the Exmoor Learning & Engagement Network, Exmoor Nature Conservation Advisory Panel, Exmoor Woodland and Forestry Advisory Group and Rural Enterprise Exmoor Group to bring numbers up to the required level.

In relation to the Exmoor Local Access Forum, the Committee requested that Officers establish after the meeting whether 3 Member representatives could be appointed to that Forum, and also requested that all Members be given the opportunity to observe those meetings when they were held.

Finally, with respect to the Farming in Protected Landscapes (FiPL) Assessment Panel which had received six expressions of interest for just four places, Miss Davis volunteered to stand down from the Panel. In addition it was suggested that the Authority Chairperson approach Mrs Webber (who was not present at the meeting) to ask her to withdraw her expression of interest. The Committee considered that as Mr Milton was required to Chair the Assessment Panel, there was already sufficient Member input in relation to farming.

**RESOLVED:** To make appointments to all operational Committees, partnership boards, working groups and outside bodies as set out in the Appendix to the report, or as agreed by the Authority Committee.

**Final Accounts Committee and Finance & Performance Advisory Panel:** Mr R Milton, Miss A V Davis, Mr M Ellicott, Mrs F Nicholson, Mr J Patrinos, Mr S J Pugsley, Miss E Stacey, Mr V White

**Standards Committee:** Mr M Ellicott, Mr J Patrinos, Mr S J Pugsley, Miss E Stacey, Mr N Thwaites

**Exmoor Local Access Forum:** Mr A Milne, Dr S Warren, Mrs P Webber  
*N.B. subject to confirmation that 3 Member representatives was acceptable*

**Exmoor Consultative and Parish Forum:** All Authority members  
Chairman of the Forum: Mr M Ellicott  
Deputy Chairman of the Forum: Mr V White

**Exmoor Historic Environment Advisory Panel:** Mrs L Blanchard, Mr J Holtom, Dr M Kelly

**Exmoor Landscape Advisory Group:** Mrs L Blanchard, Dr M Kelly, Mr A Milne, Mr N Thwaites

**Exmoor Learning and Engagement Network:** Mrs L Blanchard, Mr M Kravis, Mrs F Nicholson, Dr S Warren

**Exmoor Moorland & Farming Board:** Mr D Elson, Mr J Holtom, Mr R Milton, Mr J Yabsley

**Exmoor Nature Conservation Advisory Panel:** Mrs L Blanchard, Mr D Elson, Mr J Holtom, Mrs F Nicholson, Dr S Warren

**Exmoor Rural Housing Network:** Mr M Ellicott, Mr J Holtom, Mrs F Nicholson, Mr S J Pugsley, Mr V White

**Exmoor Woodland and Forestry Advisory Group:** Mrs L Blanchard, Mr J Holtom, Mr J Yabsley

**Equality, Diversity & Inclusion Task & Finish Group:** Mr D Elson, Mrs C Lawrence, Miss E Stacey, Dr S Warren

**External Funding Working Group:** Miss A V Davis, Mr D Elson, Dr S Warren



**Farming in Protected Landscapes Assessment Panel:** Mrs L Blanchard, Mr D Elson, Mr R Milton, Dr S Warren

**Planning Policy Advisory Group:** Mr R Milton, Miss A V Davis, Mr S J Pugsley, Mr J Holtom, Dr M Kelly, Mrs C Lawrence, Mr A Milne, Mrs F Nicholson, Mr V White

**Rural Enterprise Exmoor Group:** Miss A V Davis (*representing Devon side of park*), Mrs C Lawrence and Mrs F Nicholson (*jointly representing Somerset side of park*)

**Simonsbath Steering Group:** Miss E Stacey, Miss A V Davis (sub)

**Visit Exmoor:** Miss E Stacey, Mr N Thwaites (sub)

**UK National Parks Chairs Forum:** Mr R Milton, Miss A V Davis (sub)

**National Parks England Executive Committee:** Mr R Milton, Miss A V Davis (sub)

**National Parks Climate Change Group:** Mr D Elson

**Campaign for National Parks:** Miss A V Davis

**Exmoor Hill Farming Network:** Mr M Ellicott, Mr E Ley

**North Devon AONB Partnership:** Mr D Elson

**Independent Person:** Mr M Riggulsford

## 11. CORPORATE PLAN REPORT 2021-22

The Authority considered the [report](#) of the Head of Strategy and Performance

### The Authority's Consideration

Members thanked the Head of Strategy and Performance for a clear and informative report. Given the age profile of current staff, Members were interested to learn how the Authority could attract younger people and details of the efforts made by the HR Advisor and Learning & Engagement Team were outlined. It was noted that apprenticeships were offered at both Devon and Somerset County Council's and that the Authority might wish to consider approaching them to discuss whether it would be possible to include a placement at Exmoor National Park Authority as part of their overall programmes.

In relation to queries raised about the increasing deer numbers on Exmoor and what impacts the incidence of TB in deer and game shooting might have on that, it was confirmed that the Authority continued to gather data and engaged on these issues where it could, whilst recognising that it did not have any direct powers in these areas.

In response to a Member question, an explanation was provided on how the Partnership Plan and Corporate Plan worked in conjunction with each other, along with more periodic documents such as the State of the Park Report. The meeting was advised that in the next few months it was intended to bring together the various Partnership Plan Groups on a thematic basis, to work on cross cutting issues such as climate change.

**RESOLVED:**

- (1) To note the achievements in delivering the Authority's key commitments set out in the Corporate Plan 2021-2022 and to formally note Members' and Leadership Team's thanks to the staff for continuing to deliver services and corporate priorities.
- (2) To delegate to the Finance and Performance Advisory Panel and Leadership Team further scrutiny of Authority performance across the Corporate Plan 2022-2023 actions for the reporting period to 31 March 2023.

**12. PERSONNEL UPDATE:** The Authority noted the recent staff changes as set out on the agenda.

**13. ANY OTHER BUSINESS OF URGENCY**

The meeting noted that Standing Order 19.2 requires that a meeting of the Standards Committee must be convened on the same day as the Annual Meeting, for the purposes of electing a Chairperson and Deputy Chairperson. However, due to Member apologies received, a meeting of the Standards Committee would not be quorate. Motions were therefore proposed and seconded to temporarily amend Standing Orders to enable a meeting of the Standards Committee to be held on another date, which would be confirmed in due course.

**RESOLVED:**

- (1) To suspend the requirements of Standing Order 17.1 for the purposes of Item 14 on the agenda.
- (2) (a) To amend the wording of Standing Order 19.2 to read as follows:

“After the Annual Meeting and on the same day the Authority shall convene a meeting of each Standing Committee to elect a Chairperson and Deputy Chairperson from amongst the Committee's members where such appointments are not prescribed under the Scheme of Delegation, save that: in respect of the Annual Meeting held in 2022 only, the Standards Committee need not convene on the same day as the Annual Meeting.”
- (b) Once the Standards Committee is convened following the 2022 Annual Meeting and elects a Chairperson and a Deputy Chairperson, Standing Order 19.2 shall automatically revert to its previous wording.

The meeting closed for recess at 12.39 pm

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**Items relating to the Authority's role as sole local planning authority for the National Park area including determination of planning applications.** This section of the meeting was chaired by Mr S J Pugsley, Deputy Chairperson (Planning).

The meeting reconvened at 1.30 pm

## DEVELOPMENT MANAGEMENT

**14. Application No: 6/35/22/101**

**Location: Land adjoining B3224 at Treborough Common – Easting 300250: Northing 135050, Treborough, Watchet**

**Proposal: Proposed storage of timber and wood chipping operation used in connection with the applicant's existing combined heat and power generating business on land form part of the parking area previously granted planning permission (6/35/08/101) for the nearby equestrian course. Resubmission of application 6/35/21/103. (Part retrospective)**

The Authority considered the [report](#) of the Head of Planning and Sustainable Development.

### **The Authority's Consideration**

The Head of Planning and Sustainable Developed advised the meeting that since publication of the Committee Report, Officers had received some comments and concerns regarding a number of points made in the report. It was considered it would be beneficial for Officers to consider those points in more detail before any decision was made by Members, to ensure that decision was robust and defensible.

In addition, following a conversation with the Deputy Chairperson (Planning) and in line with similar sites previously, it was felt it would be beneficial to hold a Committee Site Visit to enable Members to understand the context of the site and its relationship with the existing business site.

It was therefore the recommendation of Officers that Members defer determination of the application to allow for a Site Visit to take place and allow Officers to review the report and make any changes that might be required, before bringing the application back before the Authority.

**RESOLVED:** To defer determination of the application to allow for Officers to review the report in the light of concerns raised, and to hold a site visit (details of the site visit are set out in Minute 18 below).

**15. Application No: 6/27/22/106**

**Location: Watermill Cottage, Hawkcombe, Porlock, Minehead, TA24 8QW**

**Proposal: Proposed erection of a 3m x 3m detached shed. Retrospective2**

The Authority considered the [report](#) of the Head of Planning and Sustainable Development.

**RESOLVED:** To refuse planning permission for the reasons set out in the report:

**16. Application No: 6/40/22/102**

**Location: River Barle (Easting 285773, Northing 133879), Below Great Bradley, Withypool, Minehead, Somerset**

**Proposal: Application Under Regulation 3 of The Town & Country Planning General Regulations 1992 for proposed construction of footbridge**

The Authority considered the [report](#) of the Head of Planning and Sustainable Development.

**RESOLVED:** To grant planning permission subject to the conditions set out in the report:

17. **APPLICATION DECISIONS DELEGATED TO THE CHIEF EXECUTIVE:** The Authority noted the decisions of the Chief Executive determined under delegated powers.
18. **SITE VISITS:** In respect of the decision taken in Minute 14 in relation to Planning Application No. 6/35/22/101 to hold a site visit, it was **RESOLVED** that a site visit be held on Friday, 1 July 2022.

The meeting closed at 2.16 pm

(Chairperson)

## EXMOOR NATIONAL PARK AUTHORITY

5 July 2022

### INTERNAL AUDIT ARRANGEMENTS

#### Report of the Chief Finance Officer

**Purpose of Report:** To present to Members a report on the internal audit work carried out during 2021/22 and the planned programme for 2022/23.

**RECOMMENDATIONS:** The Authority is recommended to RECEIVE the Internal Audit report for 2021/22 and Charter and Strategy and NOTE the Work Programme planned for 2022/23.

**Authority priority:** Achieve by providing core services; getting best value from our resources; and improving our performance.

**Legal and equality implications:** Local Government Act 2003, Parts 1-3 (Capital Finance, Financial Administration and Grants), Sections 1-39, Accounts and Audit (England) Regulations 2011, Part 2 (Financial Management and Internal Control).

The equality and human rights impact of the recommendations of this report have been assessed as having no adverse impact on any particular group or individual.

**Financial and risk implications:** Provision has been made in the 2021/22 and 2022/23 budgets to cover the costs of audit. Internal Audit forms a major part of the governance and risk management arrangements of the Authority.

**Climate change response:** Nothing contained within this report will impact upon the Authority's ability to meet its climate change targets.

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#### 1. Internal Audit

- 1.1 The Local Government Act 1972 and our Financial Regulations require the Chief Finance Officer (Section 151 Officer) to arrange for the provision of an adequate and effective system of internal audit. This service has been provided through a Service Level Agreement with Devon County Council and delivered by the Devon Audit Partnership (DAP) which is a shared service arrangement between Devon County Council, Torbay Council, Torridge and Plymouth City Council. The Partnership also provides the internal audit service to Dartmoor National Park Authority.
- 1.2 Attached at Appendix 1 is the Internal Audit Annual Report for 2021/22 and the proposed Audit Plan for 2022/23. Members will note from the annual audit report that there are no significant issues to be brought to the attention of the Authority concerning the Key Financial Systems. In Section 4.2 of Appendix 1 there is a list of the seven core areas concerning our key financial systems and the auditor has given a high standard level of assurance for all of these. In 2021/22 Internal Audit also completed work on Information Governance and followed up on the Climate Change work from previous years.

- 1.3 Section 2 of Appendix 1 contains the Internal Audit Plan for 2022/23. This plan continues at the previously agreed number of 23 audit days per annum that includes 3 days contingency provision.
- 1.4 It is anticipated that a member of the Devon Audit Partnership will be present to introduce their report.

**Gordon Bryant**  
**Chief Finance Officer**  
**June 2022**

## EXMOOR NATIONAL PARK

# ANNUAL INTERNAL AUDIT REPORT 2021/22 and PROPOSED INTERNAL AUDIT PLAN 2022/23

### Section 1 - ANNUAL INTERNAL AUDIT REPORT 2021/22

#### 1 INTRODUCTION

1.1 The following report sets out the background to audit service provision, review work undertaken in 2021/22, and provides an opinion on the overall adequacy and effectiveness of the Authority's internal control environment.

1.2 The Accounts and Audit Regulations 2015 specify that all Authorities are required to carry out a review at least once each year of the effectiveness of its system of internal control, and to incorporate the results of that review into their Annual Governance Statement (AGS), which must be published with the annual Statement of Accounts.

#### 2 BACKGROUND

##### 2.1 Service Provision

2.1.1 The Internal Audit (IA) Service for Exmoor National Park Authority is delivered by the Devon Audit Partnership. This is a shared service arrangement between Devon, Torbay, Plymouth, Torridge, Mid-Devon, West Devon and South Hams councils constituted under section 20 of the Local Government Act 2000.

##### 2.2 Regulatory Role

2.2.1 There are two principal pieces of legislation that impact upon internal audit in local authorities:

- **Section 6 of the Accounts and Audit Regulations (England) Regulations 2015** which states that:
  - “.....A relevant authority must, each financial year—
    - (a) conduct a review of the effectiveness of the system of internal control and
    - (b) prepare an annual governance statement”
- **Section 151 of the Local Government Act 1972**, which requires every local authority to make arrangements for the proper administration of its financial affairs.



2.2.2 'Proper practices' have been agreed and defined by the accounting bodies including the Chartered Institute of Public Finance and Accounts and the Chartered Institute of Internal Auditors as those set out in the Public Sector Internal Audit Standards (PSIAS).

2.2.3 In addition, Internal Audit is governed by policies, procedures, rules and regulations established by the Authority. These include standing orders, schemes of delegation, financial regulations, conditions of service, anti-fraud and corruption strategies, fraud prevention procedures and codes of conduct, amongst others.

### **3 OBJECTIVES AND SCOPE**

3.1 This report presents a summary of the audit work undertaken; includes an opinion on the adequacy and effectiveness of the Authority's internal control environment. The report outlines the level of assurance that we are able to provide, based on the internal audit work completed during the year.

3.2 The Chief Internal Auditor is required to provide the Authority with an assurance on the system of internal control of the Authority. It should be noted, however, that this assurance can never be absolute. The most that the internal audit service can do is to provide reasonable assurance, based on risk-based reviews and sample testing, that there are no major weaknesses in the system of control. In assessing the level of assurance to be given the following have been taken into account:

- the audits completed during 2021/22;
- any significant recommendations not accepted by management and the consequent risks;
- internal audit's performance;
- any limitations that may have been placed on the scope of internal audit.

### **4 INTERNAL AUDIT COVERAGE 2021/22**

4.1 In January 2022, Devon Audit Partnership carried out the annual review of the Authority's Key Financial Systems. In addition, auditors undertook a review of Information Governance arrangements, with particular emphasis upon the security of computerised data, as well as a "follow-up" review of Climate Change, to check on progress with implementing agreed recommendations arising from our review conducted in 2020/21.

#### **Key Financial Systems**

4.2 We are, once again, able to provide a "substantial" level of assurance to the Authority in relation to the internal controls that are in place to manage the Main Accounting System, budget setting / monitoring process, Payroll and Treasury Management amongst other things. This means the system and controls in place adequately mitigate exposure to the risks identified.



The system is being adhered to and substantial reliance can be placed upon the procedures in place. The individual opinions issued in respect of our assignment work were as follows:-

Areas Covered		Level of Assurance
1	Income Collection	Substantial Assurance
2	Purchasing and Payments	Substantial Assurance
3	Payroll and Travel Expenditure	Substantial Assurance
4	Main Accounting System	Substantial Assurance
5	Budgetary Control	Substantial Assurance
6	Bank reconciliations	Substantial Assurance
7	Treasury Management	Substantial Assurance

4.3 As noted in previous annual reports, the financial management arrangements within the Authority are well established and many members of staff have long experience, giving them a good understanding and knowledge of the financial controls and requirements of regulations and policies. We have developed good relations with the Chief Finance Officer and are available to be consulted on matters relating to control mechanisms.

4.4 Following discussions and limited testing over a two-week period, our opinion is that the Exmoor National Park Authority continue to operate financial systems and controls to a high standard. This displays and confirms the hard work and dedication that has been input by all staff involved in the financial management of the Park Authority during the last financial year during challenging times.

4.5 One minor recommendation was made with the intention to assist management with maintaining these high standards going forward. This was in respect of an instance found during our testing whereby the recording of staff absence and the subsequent "Return to Work" process were not conducted in a timely manner.

### Climate Change Follow-Up

4.6 Our 2020/21 audit review on Climate Change provided a Limited Assurance Opinion, with six recommendations and two "Opportunities". Our subsequent review, conducted in November 2021, provides an assessment on progress to implement the agreed recommendations made in the initial report.

4.7 Good progress has been made to implement the recommendations from our initial report. We judge that all but one of the recommendations made in the 2020/21 report have either been implemented or completed. The Climate Action Plan has been discussed and agreed by the Park Authority Board, and other activity is underway to engage with Board members to obtain their buy in, such as through youth engagement events. A member has also been appointed to support this area. A set of performance indicators have been created which



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will support monitoring and reporting. The Authority has also been involved in other initiatives including:

- Engaging with local young people to seek their views and involvement on climate change.
- A new web page highlighting the work of the authority on Climate Action.
- Seeking bids for grants and funding for projects such as at Pinkery Outdoor Learning Centre (a proposal to replace its oil-fired heating system).
- Working with other organisations to identify good practice, especially other park authorities.

4.8 While we report good progress, the Authority faces a significant challenge to make progress to a Net Zero target by 2030. The plan currently shows significant further work and resources are needed to reduce forecast emissions to net zero. In that regard, annual allocation of funding does not support consideration of longer-term funding decisions, particularly related to buildings that comprise most of the authority's emissions. Provision of multiyear allocations for next year as requested by park authorities to DEFRA would be beneficial. In that regard, it would be useful to have a clear picture of the funding and projects that are needed to make the authority substantially carbon neutral by 2030.

4.9 Work on the update to the Park's climate adaptation requirements is planned to be included as part of the next National Park Management Plan review. We understand that preparatory work for this will begin in 2022/2023 and therefore our recommendation in respect of this remains outstanding.

## **Information Governance (Cyber Security)**

4.10 The need to manage information effectively and securely has never been greater due to ever changing technological opportunities and, crucially, the current global Cyber threat environment. A successful ransomware attack, where cyber criminals take over an organisations network and request payment for its 'return', represents a substantial and ever increasing risk. Exmoor National Park must ensure that it has effective strategies, systems and procedures to mitigate against cyber threats in order to avoid the potential operational and budgetary impacts posed by being victim to a successful cyber-attack.

4.11 The potential implementation of Microsoft's 365 (M365) presents opportunities to improve security, create efficiencies and, utilise the potential technical advantages that it can offer. However, it is essential that the National Park properly understand what and how its information and data is to be held and how it is to be used prior to any implementation. A review of the Information Asset Register (IAR) is an essential activity to ensure the ongoing secure and proper use of information and compliance with the Data Protection Act. Once this has been done, the Authority will be able to properly structure its data repositories and configure access and security on the M365 platform.

4.12 Finalising and adopting the new IT Strategy will help inform the new policies (including cyber security) to reflect changes to ways of working. The procurement of Microsoft E5 security licences would help further secure devices and data utilising improved functionality such as real time threat protection.



4.13 Our review made a number of recommendations to improve existing processes and controls which included:

- Business Continuity Plans recognising the Cyber Security threat;
- the reviewing and updating of the Information Asset Register to reflect the implementation of Microsoft;
- the continuing review of firewall rules;
- Administrative Account access;
- Malware scanning;
- Removal of redundant software;
- Patch management;
- Cyber Attack awareness training.

4.14 Notwithstanding the above, we were able to give a "Reasonable Assurance" opinion and time will be set aside to carry out a follow up exercise during the course of this current audit year, to assess progress made by officers in implementing the agreed action

## **5 INTERNAL AUDIT OPINION**

5.1 In carrying out systems and other reviews, Internal Audit assesses whether key, and other, controls are operating satisfactorily within the area under review, and an opinion on the adequacy of controls is provided to management as part of the audit report.

5.2 Our final audit reports also include an action plan which identifies responsible officers, and target dates, to address control issues identified during a review. Implementation of action plans are reviewed during subsequent audits or as part of a specific follow-up process.

5.3 Management has been provided with details of our work completed in 2021/22 to assist them when considering governance arrangements. The expectation is that if significant weaknesses are identified in specific areas, these should be considered by the Authority in preparing its Annual Governance Statement; there are no such "significant weaknesses" arising from our work in 2021/22.

5.4 Overall, and based on work performed during 2021/22, Internal Audit is able to provide "Reasonable Assurance" on the adequacy and effectiveness of the Authority's internal control environment.

<b>Substantial Assurance</b>	A sound system of governance, risk management and control exists across the organisation, with internal controls operating effectively and being consistently applied to support the achievement of strategic and operational objectives.
<b>Reasonable Assurance</b>	There are generally sound systems of governance, risk management and control in place across the organisation. Some issues, non-compliance or scope for improvement were identified which may put at risk the achievement of some of the strategic and operational objectives.
<b>Limited Assurance</b>	Significant gaps, weaknesses or non-compliance were identified across the organisation. Improvement is required to the system of governance, risk management and control to effectively manage risks and ensure that strategic and operational objectives can be achieved.
<b>No Assurance</b>	Immediate action is required to address fundamental control gaps, weaknesses or issues of non-compliance identified across the organisation. The system of governance, risk management and control is inadequate to effectively manage risks to the achievement of strategic and operational objectives.

## Section 2 - INTERNAL AUDIT PLAN 2022/23

### 1 INTRODUCTION

1.1 Under the Local Government Act 1972, the Chief Financial Officer has a statutory duty to ensure that all financial systems in the Authority are secure. Assurance that this is the case is given through the reporting of Internal Audit. Audits will be carried out under the terms of Accountancy and Audit Regulations 2015.

1.2 As the Internal Auditors for Exmoor National Park Authority it is our responsibility to ensure that all financial systems are operating effectively and in line with the Authority's financial regulations.

### 2 THE AIM OF THE PLAN

2.1 The plan is reviewed and agreed on an annual basis, incorporating the key risks identified through the Authority's risk register and areas identified by Internal Audit. The plan also incorporates the requirements of the External Auditors in reviewing finance systems.



2.2 The main objectives of the plan are to provide assurance to the Section 151 Officer and the external auditors that all financial systems are: -

- Secure;
- Effective;
- Efficient;
- Accurate;
- Complete;
- Compliant.

2.3 In order to confirm this, system reviews and compliance testing are completed either remotely or at the Authority's HQ (Dulverton, Somerset) and other sites located throughout the Park, as required or appropriate.

### **3 THE PLAN**

3.1 The audit plan for the financial year 2022/23 allows for up to 23 days of internal audit support.

3.2 This covers the financial audit reviews required as part of Internal Audit responsibilities in reporting to the Section 151 Officer, but also satisfies your external auditors of the security and effectiveness of the financial systems. As your Internal Auditors we will provide the documentation required by external audit to ensure they are satisfied with operations.

3.3 We liaise with your external auditors to discuss the testing planned to ensure this satisfies their requirements and reduces their need for review of these financial systems. The remainder of the planned days incorporates reviews of specific systems as identified through an audit risk assessment process, the Authority's risk register and liaison with management.

3.4 The plan includes a review of the following key financial systems:-

- Payroll
- Creditors (payments)
- Debtors (income collection)
- Main Accounting system
- Budgetary control
- Bank Reconciliation

Note – these reviews may change to take account of the needs of External Audit.

3.5 Any major findings (if applicable) from the previous year's audit plan will be reviewed to ensure that agreed recommendations have been implemented and are effective. An annual report for your Park Authority Committee will be produced in good time and for the expected June 2023 meeting.

3.6 As part of the audit plan we will also provide assistance and advice and be a central contact point for the Chief Finance Officer. We would be happy to consider undertaking special project work as and when appropriate and required.

## 4 TIMETABLE

4.1 The audits will be completed at specified times of the year through consultation and prior agreement of the Chief Finance Officer. This will also take into account the timetable of external audit where applicable.

4.2 All findings will be reviewed with the Chief Finance Officer at the end of each audit programme and prior to the issue of any draft reports.

4.3 A copy of all final reports will be available to your External Auditors for their information.

## 5 2022/23 PLAN

5.1 The following table sets out the planned internal audit work for 2022/23. Other issues and systems are sometimes identified during the course of the audits and if found will be discussed with the Chief Finance Officer. These issues may be incorporated into future audit plans dependent upon priority and risk assessment.

<b>Audit</b>	<b>Days</b>
Material systems	
Financial Systems	12
Risk Based	
TBC	3
Information Management	3
Other work	
Audit Plan / Annual Report etc	2
Contingency - To cover additional work if required	3
<b>Total days</b>	<b>23</b>

5.2 The cost of these 23 days will be £6,877 (plus VAT) (please note we shall only charge for contingency days if these are required). Additional support will be provided as and when required. Our standard daily rate for this work will be £299, although specialist support may be at a different rate. Please contact us for further details. (Please note that this is an increase of approximately 2% on last year's rates).

Robert Hutchins  
Head of Devon Audit Partnership  
June 2022

## MISSION

The Mission of Devon Audit Partnership is to enhance and protect organisational value by providing risk based and objective assurance, advice and insight across its partners.

## TERMS OF REFERENCE

This document details the **Internal Audit Charter** and **Internal Audit Strategy** for the Park Authority as required by the Public Sector Internal Audit Standards (PSIAS). The Audit Charter formally describes the purpose, authority, and principal responsibilities of the Authority's Internal Audit Service, which is provided by the [Devon Audit Partnership \(DAP\)](#), and the scope of Internal Audit work. This Charter complies with the mandatory requirements of the PSIAS. The accompanying Audit Strategy is designed to deliver the requirements outlined in the Charter.

## DEFINITIONS

Internal auditing is defined by the Public Sector Internal Audit Standards (PSIAS) as “an independent, objective assurance and consulting activity designed to add value and improve an organisation's operations. It helps an organisation accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control and governance processes”.

The PSIAS set out the requirements of a 'Board' and of 'Senior Management'. For the purposes of the internal audit activity within the Authority the role of the Board within the Standards is taken by the Authority's Exmoor National Park Authority Committee and Senior Management is the Authority's Leadership Team. They also make reference to the role of “Chief Audit Executive”. For the Authority, this role is fulfilled by the Head of Devon Audit Partnership (HoDAP).

# INDEX TO SECTIONS OF THE CHARTER AND STRATEGY

## Charter

1. Statutory Requirements and Purpose of Internal Audit
2. Professionalism, Ethics and Independence
3. Authority
4. Accountability
5. Responsibilities
6. Management
7. Internal Audit Plan and Resources
8. Internal Audit Reporting
9. Relationship with the Park Committee and Non Conformance to the Charter
10. Quality Assurance and Improvement Programme

## Strategy

- Audit Strategy - Purpose
- Annual Audit Opinion
- Audit Planning & Delivery
- Performance Management and Quality Assurance
- Resources and skills
- Staff Development and use of MKI



# CHARTER - STATUTORY REQUIREMENTS AND PURPOSE OF INTERNAL AUDIT

## Statutory Requirements

Internal Audit is a statutory service in the context of The Accounts and Audit (England) Regulations 2015, which state:

*5.—(1) A relevant authority must undertake an effective internal audit to evaluate the effectiveness of its risk management, control and governance processes, taking into account public sector internal auditing standards or guidance.*

In addition, the Local Government Act 1972, Section 151, requires every local authority to designate an officer responsible for the proper administration of its financial affairs. In the Park Authority, the Chief Finance Officer is the 'Section 151 Officer'. One way in which this duty is discharged is by maintaining an adequate and effective internal audit service.

## The Purpose and Aim of Internal Audit

The role of Internal Audit is to understand the key risks of the National Park Authority, to examine and evaluate the adequacy and effectiveness of the system of risk management and the entire control environment as operated throughout the organisation, and contribute to the proper, economic, efficient and effective use of resources. In addition, the other objectives of the function are to:

- Support the Section 151 Officer to discharge his / her statutory duties
- Contribute to and support the Finance function in ensuring the provision of, and promoting the need for, sound financial systems
- Support the corporate efficiency and resource management processes by conducting value for money and efficiency studies and supporting the work of corporate working groups as appropriate
- Provide a quality fraud investigation service which safeguards public monies.

The existence of Internal Audit does not diminish the responsibility of management to establish systems of internal control to ensure that activities are conducted in a secure, efficient and well-ordered manner.

Internal Audit for the Authority is provided by Devon Audit Partnership. We aim to provide a high quality, professional, effective and efficient Internal Audit Service to the Members, service areas and units of the Authority, adding value whenever possible.

# CHARTER - PROFESSIONALISM, ETHICS AND INDEPENDENCE

## Being Professional

Devon Audit Partnership will adhere to the relevant codes and guidance. In particular, we adhere to the Institute of Internal Auditors' (IIA's) mandatory guidance including the Definition of Internal Auditing, the Code of Ethics, and the Public Sector Internal Audit Standards. This mandatory guidance constitutes principles of the fundamental requirements for the professional practice of internal auditing within the public sector and for evaluating the effectiveness of Internal Audit's performance. The IIA's Practice Advisories, Practice Guides, and Position Papers will also be adhered to as applicable to guide operations. In addition, Internal Audit will adhere to the Authority's relevant policies and procedures and the internal audit manual. Internal Auditors must apply the care and skill expected of a reasonably prudent and competent internal auditor. Due professional care does not, however, imply infallibility.

## Our Ethics

Internal auditors in UK public sector organisations must conform to the Code of Ethics as set out by IIA. This Code of Ethics promotes an ethical culture in the profession of internal auditing. If individual internal auditors have membership of another professional body then he or she must also comply with the relevant requirements of that organisation.

The Code of Ethics extends beyond the definition of internal auditing to include two essential components:

1. Principles that are relevant to the profession and practice of internal auditing.
2. Rules of Conduct that describe behaviour norms expected of internal auditors.

The Code of Ethics provides guidance to internal auditors serving others, and applies to both individuals and entities that provide internal auditing services. The Code of Ethics promotes an ethical, professional culture. It does not supersede or replace Codes of Ethics of employing organisations. Internal auditors must also have regard to the Committee on Standards of Public Life's Seven Principles of Public Life.

# CHARTER - PROFESSIONALISM, ETHICS AND INDEPENDENCE

## Being Independent

Internal Audit should be independent of the activities that it audits. The status of Internal Audit should enable it to function effectively. The support of the Authority is essential and recognition of the independence of Internal Audit is fundamental to its effectiveness.

The Head of Devon Audit Partnership should have direct access to and freedom to report in his or her own name and without fear or favour to, all officers and members and particularly to those charged with governance (the Authority). In the event of the necessity arising, the facility also exists for Internal Audit to have direct access to the Chief Executive, the S.151 Officer and the Chair of the Exmoor National Park Authority Committee.

The Authority should make arrangements for Internal Audit to have adequate budgetary resources to maintain organisational independence.

The Head of Devon Audit Partnership should have sufficient status to facilitate the effective discussion of audit strategies, audit plans, audit reports and action plans with senior management and members of the Authority.

Auditors should be mindful of being independent, and must:

- Have an objective attitude of mind and be in a sufficiently independent position to be able to exercise judgment, express opinions and present recommendations with impartiality;
- Notwithstanding employment by the Partnership / Authority, be free from any conflict of interest arising from any professional or personal relationships or from any pecuniary or other interests in an activity or organisation which is subject to audit;
- Be free from undue influences which either restrict or modify the scope or conduct of their work or significantly affect judgment as to the content of the internal audit report; and
- Not allow their objectivity to be impaired by auditing an activity for which they have or have had responsibility.

## CHARTER - AUTHORITY

Internal Audit, with strict accountability for confidentiality and safeguarding records and information, is authorised full, free, and unrestricted access to any and all of the organisation's records, physical properties, and personnel pertinent to carrying out any engagement.

All employees are requested to assist Internal Audit in fulfilling its roles and responsibilities. This is enforced in the Accounts and Audit (England) Regulations 2015 section 5(2-3) that state that: Any officer or member of a relevant authority must, if required to do so for the purposes of the internal audit:

- 2) (a) make available such documents and records; and
- (b) supply such information and explanations; as are considered necessary by those conducting the internal audit.
- (3) in this regulation “documents and records” includes information recorded in an electronic form.

In addition, Internal Audit, through the HoDAP, where deemed necessary, will have unrestricted access to:

- The Chief Executive
- Members
- Individual Heads of Service
- Section 151 Officer
- Monitoring Officer
- All authority employees
- All authority premises.

## CHARTER - ACCOUNTABILITY

Devon Audit Partnership is a shared service established and managed via a Partnership Committee and Board with representation from each of its founding partners. The Partnership operates as a separate entity from the client authorities and Internal Audit is therefore independent of the activities which it audits. This ensures unbiased judgements essential to proper conduct and the provision of impartial advice to management. DAP operates within a framework that allows:

- Unrestricted access to senior management and members;
- Reporting in its own name;
- and Separation from line operations

Every effort will be made to preserve objectivity by ensuring that all audit members of audit staff are free from any conflicts of interest and do not, ordinarily, undertake any non-audit duties.

The HoDAP fulfils the role of Chief Audit Executive at the Authority and will confirm to the Exmoor National Park Authority Committee, at least annually, the organisational independence of the internal audit activity. The National Park Authority's 'Section 151 Officer' will liaise with the HoDAP and is therefore responsible for monitoring performance and ensuring independence.

The HoDAP reports functionally to the Exmoor National Park Authority Committee on items such as:

- Approving the internal audit charter;
- Approving the risk based internal audit plan and resources;
- Receiving reports from the Head of Devon Audit Partnership on the section's performance against the plan and other matters;
- Approving the Head of Devon Audit Partnership's annual report'
- Approve the review of the effectiveness of the system of internal audit.

The HoDAP has direct access to the Chair of the Authority, and has the opportunity to meet privately with the Exmoor National Park Authority Committee.

## CHARTER - RESPONSIBILITIES

The Chief Executive (National Park Officer), Heads of Service and other senior officers are responsible for ensuring internal control arrangements are sufficient to address the risks facing their services. The HoDAP will provide assurance to the Chief Finance Officer 'Section 151 Officer' regarding the adequacy and effectiveness of the Authority's financial framework, helping meet obligations under the LGA 1972 Section 151.

The HoDAP will provide assurance to the Monitoring Officer in relation to the adequacy and effectiveness of the systems of governance within the Authority helping him/her meet his/her obligations under the Local Government and Housing Act 1989 and the Authority's Standing Orders. The HoDAP will also work with the Monitoring Officer to ensure the effective implementation of the Authority's Whistleblowing Policy.

### Internal Audit responsibilities include:

- Examining and evaluating the soundness, adequacy and application of the Authority's systems of internal control, risk management and corporate governance arrangements;
- Reviewing the reliability and integrity of financial and operating information and the means used to identify, measure, classify and report such information;
- Reviewing the systems established to ensure compliance with policies, plans, procedures and regulations which could have a significant impact on operations;
- Reviewing the means of safeguarding assets and, as appropriate, verifying the existence of such assets;
- Investigating alleged fraud and other irregularities referred to the service by management, or concerns of fraud or other irregularities arising from audits, where it is considered that an independent investigation cannot be carried out by management;
- Appraising the economy, efficiency and effectiveness with which resources are employed and the quality of performance in carrying out assigned duties including Value for Money Studies;
- Working in partnership with other bodies to secure robust internal controls that protect the Authority's interests;
- Advising on internal control implications of new systems;
- Providing consulting and advisory services related to governance, risk management and control as appropriate for the organisation; and,
- Reporting significant risk exposures and control issues identified to the Exmoor National Park Authority Committee and to senior management, including fraud risks, governance issues.

# CHARTER - MANAGEMENT

The PSIAS describe the requirement for the management of the internal audit function. This sets out various criteria that the HoDAP (as Chief Audit Executive) must meet, and includes:

- Be appropriately qualified;
- Determine the priorities of, deliver and manage the Authority's internal audit service through a risk based annual audit plan;
- Regularly liaise with the Authority's external auditors to ensure that scarce audit resources are used effectively;
- Include in the plan the approach to using other sources of assurance if appropriate;
- Be accountable, report and build a relationship with the Exmoor National Park Authority Committee and S.151 Officer; and
- Monitor and report upon the effectiveness of the service delivered and compliance with professional and ethical standards.

These criteria are brought together in an Audit Strategy which explains how the service will be delivered and reflect the resources and skills required.

The HoDAP is required to give an annual audit opinion on the governance, risk and control framework based on the audit work done.

The HoDAP should also have the opportunity for free and unfettered access to the Chief Executive and meet periodically with the Monitoring Officer and S.151 Officer to discuss issues that may impact on the Authority's governance, risk and control framework and agree any action required.

# CHARTER - INTERNAL AUDIT PLAN AND RESOURCES

At least annually, the HoDAP will submit to the Exmoor National Park Authority Committee a risk-based internal audit plan for review and approval. The HoDAP will:

- Develop the annual plan through discussions with Leadership and Heads of Service based on an understanding of the significant risks of the organisation;
- Submit the plan to the Exmoor National Park Authority Committee for review and agreement;
- Implement the agreed audit plan;
- Maintain a professional audit staff with sufficient knowledge, skills and experience to carry out the plan and carry out continuous review of the development and training needs;
- Maintain a programme of quality assurance and a culture of continuous improvement;

The internal audit plan will include timings as well as budget and resource requirements for the next fiscal year. The Head of internal audit will communicate the impact of resource limitations and significant interim changes to senior management and the Exmoor National Park Authority Committee.

Internal Audit resources must be appropriately targeted by assessing the risk, materiality and dependency of the Authority's systems and processes. Any significant deviation from the approved Internal Audit plan will be communicated through the periodic activity reporting process.

A requirement of the Authority's Anti-Fraud and Corruption Strategy is that the HoDAP be notified of all suspected or detected fraud, corruption or impropriety. All reported irregularities will be investigated in line with established strategies and policies. The audit plan will include sufficient resource to undertake proactive anti-fraud work. Internal audit activities will be conducted in accordance with Authority strategic objectives and established policies / procedures.

Monitoring of internal audit's processes is carried out on a continuous basis by internal audit management. The Authority's members and management may rely on the professional expertise of the HoDAP to provide assurance. Periodically, independent review may be carried out: for example, through peer reviews; ensuring compliance with the PSIAS is an essential approach to such a review.



# CHARTER - INTERNAL AUDIT REPORTING

The primary purpose of Internal Audit reporting is to provide to management an independent and objective opinion on governance, the control environment and risk exposure and to prompt management to implement agreed actions. Internal Audit should have direct access and freedom to report in their own name and without fear or favour to, all officers and members, particularly to those charged with governance (the Exmoor National Park Authority Committee).

A written report will be prepared for every internal audit project and issued to the appropriate manager accountable for the activities under review. Reports will include an 'opinion' on the risk and adequacy of controls in the area that has been audited, which, together, will form the basis of the annual audit opinion on the overall control environment.

The aim of every Internal Audit report should be to:

- Give an opinion on the risk and controls of the area under review, building up to the annual opinion on the control environment; and
- Recommend and agree actions for change leading to improvement in governance, risk management, the control environment and performance.

The Manager will be asked to respond to the report within 30 days, although this period can be extended by agreement.

The response must show what actions have been taken or are planned in relation to each risk or control weakness identified. If action is not to be taken, this must also be stated. The HoDAP is responsible for assessing whether the manager's response is adequate.

Where deemed necessary, the Internal Audit report will be subject to a follow-up, normally within six months of its issue, in order to ascertain whether the action stated by management in their response to the report has been implemented.

The HoDAP will:

- Submit periodic reports to the Exmoor National Park Authority Committee summarising key findings of reviews and the results of follow-ups undertaken;
- Submit an Annual Internal Audit Report to the Exmoor National Park Authority Committee, incorporating an opinion on the Authority's control environment. This will also inform the Annual Governance Statement.

# CHARTER - RELATIONSHIP WITH THE Exmoor National Park Authority Committee, AND NON CONFORMANCE TO THE CHARTER

The Authority's Exmoor National Park Authority Committee will act as "the Board" as defined in the Public Sector Internal Audit Standards (PSIAS),

The Specific Functions of the Exmoor National Park Authority Committee are set out in the Authority's Standing Orders (Appendix 1) "Powers Duties and Functions of the Authority Meeting"..

The HoDAP will assist the Committee in being effective and in meeting its obligations. To facilitate this, the HoDAP will:

- Attend meetings, and contribute to the agenda;
- Ensure that it receives, and understands, documents that describe how Internal Audit will fulfil its objectives (e.g. the Audit Strategy, annual work programmes, progress reports);
- report the outcomes of internal audit work, in sufficient detail to allow the committee to understand what assurance it can take from that work and/or what unresolved risks or issues it needs to address;
- establish if anything arising from the work of the committee requires consideration of changes to the audit plan, and vice versa;
- present an annual report on the effectiveness of the system of internal audit; and
- present an annual internal audit report including an overall opinion on the governance, risk and control framework

Any instances of non conformance with the Internal Audit Definition, Code of Conduct or the Standards must be reported to the Exmoor National Park Authority Committee, and in significant cases consideration given to inclusion in the Annual Governance Statement.

The Head of Devon Audit Partnership will advise the Exmoor National Park Authority Committee on behalf of the Authority on the content of the Charter and the need for any subsequent amendment. The Charter should be approved and regularly reviewed by the Exmoor National Park Authority Committee.

# CHARTER - QUALITY ASSURANCE AND IMPROVEMENT PROGRAMME

The PSIAS states that a quality assurance and improvement programme must be developed; the programme should be informed by both internal and external assessments.

An external assessment must be conducted at least once in five years by a suitably qualified, independent assessor. For DAP this was recently conducted at the end of 2021 by the Head of Southwest London Audit Partnership, and the Chief Internal Auditor of Orbis (a partnership organisation covering Brighton and Hove, East Sussex, and Surrey County Council).

The assessment result was that *“Based on the work carried out, it is our overall opinion that DAP generally conforms\* with the Standards and the Code of Ethics”*.

The report noted that *“As a result of our work, a small number of areas where partial conformance was identified. These were minor observations, none of which were significant enough to affect the overall opinion”*. DAP is actively addressing these improvement areas.

\* **Generally Conforms** – This is the top rating and means that the internal audit service has a charter, policies and processes that are judged to be in conformance to the Standards

# AUDIT STRATEGY - PURPOSE

The PSIAS require the HoDAP to produce an Audit Charter setting out audits purpose, authority and responsibility. We deliver this through our Audit Strategy which:

- Is a high-level statement of how the internal audit service will be delivered and developed in accordance with the Charter and how it links to the organisational objectives and priorities;
- Should be approved, but not directed, by the Exmoor National Park Authority Committee.
- Will communicate the contribution that Internal Audit makes to the organisation and should include:
  - Internal audit objectives and outcomes;
  - How the HoDAP will form and evidence his opinion on the governance, risk and control framework to support the Annual Governance Statement;
  - How Internal Audit's work will identify and address significant local and national issues and risks;
  - How the service will be provided, and
  - The resources and skills required to deliver the Strategy.

The Strategy should be kept up to date with the organisation and its changing priorities.

## AUDIT STRATEGY - OPINION ON THE GOVERNANCE, RISK AND CONTROL FRAMEWORK

A key objective of Internal Audit is to communicate to management an independent and objective opinion on the governance, risk and control framework, and to prompt management to implement agreed actions.

Significant issues and risks will be brought to the attention of the S.151 Officer as and when they arise. Regular formal meetings will be held to discuss issues arising and other matters.

The HoDAP will report progress against the annual audit plan and any emerging issues and risks to the Exmoor National Park Authority Committee.

The HoDAP will also provide a written annual report to the Exmoor National Park Authority Committee, timed to support their recommendation to approve the Annual Governance Statement, to the Authority.

The Head of Devon Audit Partnership's annual report to the Exmoor National Park Authority Committee will:

- Provide an opinion on the overall adequacy and effectiveness of the Authority's governance, risk and control framework;
- Disclose any qualifications to that opinion, together with the reasons for the qualification;
- Present a summary of the audit work from which the opinion is derived, including reliance placed on work by other assurance streams;
- Draw attention to any issues the HoDAP judges particularly relevant to the preparation of the Annual Governance Statement;
- Compare audit work actually undertaken against the work that was planned and summarise the performance of the internal audit function against its performance measures and targets; and
- Comment on compliance with the Public Sector Internal Audit Standards and communicate the results of the internal audit quality assurance programme.

# AUDIT STRATEGY - PLANNING & AUDIT DELIVERY

INCLUDING LOCAL AND NATIONAL ISSUES AND RISKS

The audit planning process includes the creation of and ongoing revision of an “audit universe”. This seeks to identify all risks, systems and processes that may be subject to an internal audit review.

The audit universe will include a risk assessment scoring methodology that takes account of a number of factors including: the Authority’s own risk score; value of financial transactions; level of change, impact on the public; political sensitivity; when last audited; and the impact of an audit. This will inform the basis of the resources allocated to each planned audit area.

The results from the audit universe will be used in creating an annual audit plan; such a plan will take account of emerging risks at both local and national level.

## *Assignment Planning & Delivery*

Further planning and risk assessment is required at the commencement of each individual audit assignment to establish the scope of the audit and the level of testing required.

The primary objective of the audit is to provide management with an independent opinion on the risk and control framework through individual audits in the audit plan. Individual audits will be completed using our methodology in our Audit Manual to the standards set by PSIAS, to independently evaluate the effectiveness of internal controls. Our audit assignment report will communicate our opinion and include agreed management action, where required, to improve the effectiveness of risk management, control and governance processes.

# AUDIT STRATEGY - PERFORMANCE MANAGEMENT AND QUALITY ASSURANCE

The PSIAS state that the HoDAP should have in place an internal performance management and quality assurance framework; this framework must include:

- A comprehensive set of *targets to measure performance*. These should be regularly monitored and the progress against these targets reported appropriately;
- Seeking *user feedback* for each individual audit and periodically for the whole service;
- A periodic review of the service against the Strategy and the achievement of its aims and objectives. The results of this should inform the future Strategy and be reported to the Exmoor National Park Authority Committee;
- Internal quality reviews to be undertaken periodically to ensure compliance with the PSIAS and the Audit Manual (self-assessment); and
- An action plan to implement improvements.

The PSIAS and the Internal Audit Manual state that internal audit performance, quality and effectiveness should be assessed for each individual audit; and for the Internal Audit Service as a whole. The HoDAP will closely monitor the performance of the team to ensure agreed targets are achieved. A series of performance indicators have been developed for this purpose (please see the following pages).

Customer feedback is also used to define and refine the audit approach. Devon Audit Partnership will seek feedback from: auditees; senior leadership; and mm. The results from our feedback will be reported to Senior Management and the Exmoor National Park Authority Committee in any half year and annual reports.

The HoDAP is expected to ensure that the performance and the effectiveness of the service improves over time, in terms of both the achievement of targets and the quality of the service provided to the user.

# AUDIT STRATEGY - PERFORMANCE MANAGEMENT AND QUALITY ASSURANCE

Performance Indicator	Full year target
Percentage of Audit Plan completed	90%
Customer Satisfaction - % satisfied or very satisfied as per feedback forms	90%
Draft reports produced with target number of days (currently 15 days)	90%
Final reports produced within target number of days (currently 10 days)	90%

Internal Audit  
 Performance  
 Monitoring  
 Targets

Task	Performance measure
Agreement of Annual audit plan	Agreed by the Chief Finance Officer and Exmoor National Park Authority Committee prior to start of financial year
Agreement of assignment brief	Assignment briefs are agreed with and provided to auditee at least two weeks before planned commencement date.
Undertake audit fieldwork	Fieldwork commenced at agreed time
Verbal debrief	Confirm this took place as expected; was a useful summary of the key issues; reflects the findings in the draft report.
Draft report	Promptly issued within 15 days of finishing our fieldwork. Report is "accurate" and recommendations are both workable and useful.
Draft report meeting (if required)	Such a meeting was useful in understanding the audit issues
Annual internal audit report	Prepared promptly and ready for senior management consideration by end of May. Report accurately reflects the key issues identified during the year.
Presentation of internal audit report to Management and Audit Committee.	Presentation was clear and concise. Presenter was knowledgeable in subject area and able to answer questions posed by management / members.
Contact with the audit team outside of assignment work.	You were successfully able to contact the person you needed, or our staff directed you correctly to the appropriate person. Emails, letters, telephone calls are dealt with promptly and effectively.

Other indicators measured as part of the audit process that will be captured and reported to senior management

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# AUDIT STRATEGY - RESOURCES AND SKILLS

The PSIAS and the Audit Manual states that:

- Internal Audit must be appropriately staffed in terms of numbers, grades, qualifications and experience, having regard to its responsibilities and objectives, or have access to the appropriate resources;
- The Internal Audit service shall be managed by an appropriately qualified professional with wide experience of internal audit and of its management; and
- The Chief Audit Executive (Head of Devon Audit Partnership) should be of the calibre reflecting the responsibilities arising from the need to liaise with members, senior management and other professionals, and be suitably experienced.

DAP currently has c.40 staff who operate from any one of our three main locations (Plymouth, Torquay and Exeter), we also operate from offices at Torridge DC (Bideford), Mid Devon DC (Tiverton) and South Hams/West Devon Councils (Totnes/Tavistock). The Partnership employs a number of specialists in areas such as Computer Audit, Contracts Audit and Counter Fraud Investigators as well as a mix of experienced, professionally qualified and non-qualified staff.

The Partnership draws on a range of skilled staff to meet the audit needs. Our current staff includes: -

• 4 x Chartered Accountants	• 10 x AAT (qualified and part qualified)
• 7 x qualified IIA (CMIIA and PIIA)	• 6 x ACFS / ACFT (accredited counter fraud specialists)
• 1 x qualified computer audit (QICA & CISA)	• 5 x ILM (Institute of Leadership & Management) level 5 or above
• 1 x risk management (IRM)	• 5 Apprentices (Finance, Data Analyst, IIA, Business Admin)

# AUDIT STRATEGY - STAFF DEVELOPMENT AND TRAINING AND USE OF MK AUDIT

## **Staff Skills and Development**

Devon Audit Partnership management assess the skills of staff to ensure the right people are available to undertake the work required.

Staff keep up to date with developments within internal audit by attending seminars, taking part in webinars and conferences, attending training events and keeping up to date on topics via websites and professional bodies. Learning from these events helps management to ensure they know what skills will be required of our team in the coming years, and to plan accordingly.

Devon Audit Partnership follows formal appraisal processes that identify how employees are developing and create training and development plans to address needs.

## **Internal Audit Software System**

Devon Audit Partnership uses Pentana MK as an audit management system. This system allows Partnership management to effectively plan, deliver and report audit work in a consistent and efficient manner. The system provides a secure working platform and ensures confidentiality of data. The system promotes mobile working, allowing the team to work effectively at client locations or at remote locations should the need arise.

## EXMOOR NATIONAL PARK AUTHORITY

5 July 2022

### 2021/22 OUTTURN – BUDGET PERFORMANCE, RESERVES, NEW YEAR MONITORING AND MTFP UPDATE

#### Report of the Chief Finance Officer

**Purpose of Report:** To report on the outturn for 2021/22 compared with the revised and original budgets and also to note the position of reserves.

**RECOMMENDATIONS:** The Authority is recommended to:

- (1) NOTE the financial performance for 2021/22
- (2) APPROVE the adequacy of the General Fund Balance at 31 March 2022; and
- (3) APPROVE the transfers between reserves.
- (4) NOTE the Authority spend as at the end of month 2 in Appendix 4 and section 5.
- (5) NOTE the prudential indicators as at the end of month 2 in section 6.
- (6) NOTE the updated Medium Term Financial Position in section 7.

**Authority priority:** Achieve by providing core services; getting best value from our resources and improving our performance.

**Legal and equality implications:** Local Government Act 2003, Parts 1-3 (Capital Finance, Financial Administration and Grants), Sections 1-39.

Accounts and Audit (England) Regulations 2015, Part 2 (Financial Management and Internal Control).

The equality and human rights impact of the recommendations of this report have been assessed as having no adverse impact on any particular group or individual.

**Financial and risk implications:** The outturn for the year is within the overall net budget of the Authority which is the National Park Grant from Defra.

**Climate response:** No recommendations contained within this report have an adverse impact upon our ability to meet carbon reduction targets. The report describes spend from the Environmental Resilience reserve that occurred in 2021/22.

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#### 1. Introduction

- 1.1 The 2021/22 revenue budget was agreed on 2 March 2021 and was revised by the Authority in November. The grant settlement from Defra for 2021/22 was for one-year and was the same as for 2020/21 and for 2019/20.
- 1.2 The finances of the authority are structured in terms of the core budget, contributions to reserves, top sliced (fixed term) programmes and the small grants scheme. This report is also structured according to those categories. This report will

highlight areas of variation or discretion that has been applied in financing in year spend and managing the use of reserves. This report needs to be read in conjunction with the Corporate Plan 2021/22 – Priority Achievements which details the non-financial results for the year and was presented to the Authority in June.

- 1.3 In addition to the £3.211m of National Park Grant, in 2021/22 the Authority earned another £2.025m across all services and funding streams. This compares to £1.255m from the earlier year. This covers traded income, external grants, and contributions (e.g. 'Farming in Protected Landscapes'), fees and interest. There were no capital receipts in the year.
- 1.4 The financial impact of Covid to the Authority is diminishing. We still experienced cancellations at the Outdoor Education Centre at Pinkery but income and visitor numbers to car parks and the National Park centres were robust. We received Covid related grants totalling £44,570. These have stayed with the service.
- 1.5 The financial performance for the year was more stable than the two previous years. The year was characterized by capital works, delivery against new funding streams and significant spend within woodlands.

## **2. Core Budget Outturn 2021/22**

- 2.1 Appendix 1 summarises budget performance for 2021/22 and shows the actual spending for the year against the original and revised budgets. The overall position for 2021/22 is an outturn of £2,951,193 against the approved revised net budget of £2,957,100. This is the position after appropriations to and from reserves have been made to meet specific funding requirements and to fund project work throughout the Authority.
- 2.2 The underspend of £5,900 is transferred to general balances in the first instance.
- 2.3 Actual spend for the year is very close to the revised budgets. The pay award was eventually agreed in March and so is shown within the figures in Appendix 1. Travel costs were still much lower across the board, there was very little in the way of vacancies and the full effect of inflation is yet to be felt.
- 2.4 Members will recall from the June Authority meeting the £281k spent on the Farming in Protected Landscapes programme in the year. These costs are managed within the Core Budget but nets to zero as it is fully funded.
- 2.5 There are a few variations over £5,000 between the final budgets and the actual spend at Cost Centre level and these are:

### Conservation & Access

- The £25k overspend was due to the external costs of clearing up in woodlands after storms Dudley and Eunice. The Field Services team also did a significant amount of work clearing up also for which there is no additional cost.

### Information & Interpretation Management

- There were underspends in the printing and stationery budgets in this service area.

### Legal Support

- There were additional costs related to an ongoing planning dispute.

### Members & Corporate Management

- There was very little travel related expenditure in 2021/22.

2.6 Aside from spend from the Core Budget the Authority also provides budget for contributions to Fixed Term Programmes, Reserves, and the small grants scheme. These are detailed in Appendix 2.

### **3. Fixed Term Programmes**

- 3.1 The original fixed term programmes budget for 2021/22 was £254,400. Appendix 2 details the schemes approved against the 2021/22 Budget and their associated spend to the end of the year. There was also spend in 2021/22 against schemes that had been approved in previous years.
- 3.2 Approvals that are no longer required have been transferred to General Balances or Contingency. Other unspent approvals have been transferred to an alternative reserve if their objectives are closely aligned.
- 3.3 This outturn also recommends some transfers from within Fixed Term programmes. Funding has been transferred to meet the Historic Buildings Officer post for an additional twelve months.
- 3.4 Of the funds that have been set aside to meet a possible trading deficit at the Outdoor Education Centre, £10k has been applied to reduce the in-year deficit.
- 3.5 2021/22 was the last year when a budget (£20k) for small grants was established. This was primarily aimed at community and partnership groups to facilitate delivery of ambitions within the National Park Partnership Plan. From 2022/23 and onwards a one-off pot (£25k) was established with comparable objectives, with an aspiration that this may be topped up if funds allow. Appendix 2 also shows allocations from the small grants pot in 2021/22.

### **4. Reserves**

- 4.1 Reserves play a major role in understanding how Exmoor National Park budgets, finances spend, meets future obligations, and receives external contributions. A detailed analysis of the reserves held at 31 March 2022 is shown in Appendix 3.
- 4.2 Over 2021/22 reserves increased by £210,654 from £2,824,488 to £3,035,142 however this grossly oversimplifies the true picture. Section 4 of this report details uses of, transfers between, significant receipts and the establishment of new reserves over the year.
- 4.3 As part of setting the budget for 2021/22 there was a £155,000 contribution to reserves. There were also certain transfers between reserves at the point when the 2021/22 budget was revised as money was found to finance further costs of Ash Die-Back and 2020/21 underspend from the NPCs was transferred back to help the centres 'bounce back' from the pandemic.
- 4.4 The Authority does not currently present a capital budget within either the Original Budget in March or the Revised Budget in November although a Capital Strategy is now detailed when the forward budget is set. We will begin producing a designated Capital Budget when we set the forward budget for 2023/24 as a response to a recommendation by External Audit. Currently capital schemes either have a specific Authority paper or are reasonably small scale in nature. Capital spend in 2021/22 is listed below and was funded from reserves or external grants:
- £53k on the Visitor Facilities at Ashcombe
  - £33k on secondary double glazing at Exmoor House
  - £63k on the car park improvements at the Valley of Rocks

- £25k on the final bill for White Rock Cottage
- £52k on the establishment of Bye Wood

4.5 In addition, over £300k was spent in woodlands this year. Much of this has come from or through the Woodlands Reserve. This spend covers some of the cost of establishing a new wood at Bye Common, the removal of trees affected by Ash Die-Back or the winter storms and efforts to reduce the numbers of grey squirrels.

4.6 Appendix 3 also details certain recommended transfers between reserves to ensure that resources are allocated in line with need. The column 'Outturn Transfer between Reserves', suggests certain virements between reserves which are listed below. Members are asked to approve these changes.

- Of the in-year contributions to CareMoor (£65,244), £7k has been transferred to Rights of Way for access work, £19k to Woodlands, £2.5k to Ashcombe Gardens Restoration and £3k to Heritage Projects for Historic Signpost. Of the remaining balance of £460k, £10k is retained for conservation work and the £450k is from the two recently received legacies. Members have previously been briefed in how this is to be allocated.
- The £60k remaining balance that was earmarked for County Gate has been transferred to General Balances as it is no longer required.
- £30k is recommended to be transferred to the Development Management Reserve to meet the service pressures within Planning and Planning Enforcement.
- £25k was transferred from underspend in Rural Enterprise to the relevant reserve to fund the extension of the Funding Officer post until the end of 2022/23.
- The Capital Development Reserve has been established from the Capital Receipts pot. Capital spend that was due to be funded from specific revenue reserves has instead been funded from capital receipts. This leaves the reserve fund no longer required to be transferred to the Capital Development Reserve. The benefit of this switch is that the funds can now be spent on either capital or revenue schemes rather than purely capital as when it was sat in receipts. The purpose of this reserve is to meet costs on schemes that may sit between capital and revenue. It provides additional funding flexibility. It may be useful for schemes such as with car parks or Driver Farm where the spend facilitates improvements but is not directly attributable to the acquisition or development of assets.

4.7 The balance on the General Fund is the amount held in reserve to meet any unforeseen or exceptional items of expenditure or to provide working capital. The balance of the General Fund at 31 March 2021 of £300,000 is in line with the forecasts contained in the Medium-Term Financial Plan. This sum is considered adequate to maintain the financial viability, security and stability of the Authority and provide working capital.

4.8 Paragraph 4.2 states that the increase in reserves over the course presents an oversimplified view. This is primarily because of the legacies received but also because of the establishment of the Capital Development Reserve. The table below shows the reduction in Authority reserves since 2014/15 when legacies and the Capital Development Reserve are stripped out (in £'000s).

2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22
3,591	3,314	3,115	3,031	2,985	2,885	2,774	2,485

4.9 So even though the level of reserves appears robust, Members will see the clear downwards trend and how the headline total has been skewed by one-offs.

## 5. 2022/23 Budget Monitoring

5.1 Members will recall the recent recommendation from our external auditors that the Authority receive quarterly monitoring financial statements. Appendix 4 shows actual spend as at the end of month 2 and anticipated outturn for the year. Clearly, month 2 is not the end of the first quarter but reporting as at the end of month 2 works more smoothly for the financial reporting cycle.

5.2 It is difficult to draw conclusions about financial performance so early in the financial year. Month 2 data is skewed by the presence of accounting entries rolled over from the previous financial year, seasonality, and the presence of spend that will be funded from reserves. There are no areas of concern or interest to direct members attention to.

## 6. Quarterly Monitoring of Prudential Indicators

6.1 For completeness, and to comply with guidance, Prudential limits set, and actual outcomes are to be reported. All treasury activity was conducted within the benchmarks set as Prudential limits for prudent and sustainable capital plans, financing, and investment. Indicators approved for the year are set out in the left-hand columns, with actual outturns on the right

### 1 Borrowing Limits

Authorised	£100,000
Operational	£100,000

### Actual

<b>Nil</b>
<b>Nil</b>

### 2 Maturity Structure

	Upper Limit	Lower Limit	Value	Actual
	%	%		%
< 12m	100	0	0.00	<b>0.0</b>
> 12m < 24m	0	0	0.00	<b>0.0</b>
> 24m < 5yrs	0	0	0.00	<b>0.0</b>
> 5yrs < 10yrs	0	0	0.00	<b>0.0</b>
> 10yrs	0	0	0.00	<b>0.0</b>
			0.00	<b>0.0</b>

### 3 Investments > 365 days

0

**0**

## 7. Update to the Medium-Term Financial Plan

7.1 When the 2022/23 budget was set by the Authority it contained certain key assumptions such as concerning pay awards, base inflation, and movements in National Park Grant. We assumed in March that we would get 0% increase in NPG in 2022/23 and 2% increases for the next two financial years.

7.2 It now transpires that this was over optimistic. DEFRA have instead informed us that we will get a cash neutral grant for the three years from 2022/23 to 2024/25. As a 2% grant increase is worth £64k in 2023/24 and £66k in 2024/25, this will have an impact on the ability to deliver balanced budgets in the near term.

7.3 Below is a table that shows the budget gap that was shown when the MTFP was determined, and today's savings gap now that we know what the grant increases will be.

<b>£'000s</b>	<b>2023/24</b>	<b>2024/25</b>
Savings Gap in March	68	103
Latest Savings Gap	132	233

7.4 The Leadership Team has begun to develop ideas for achieving these savings. These will be brought before the Authority and a re-established Finance and Performance Advisory Panel in the near future. It will clearly be a major challenge to continue to fund the existing level of service provision in future.

**G Bryant**  
**Chief Finance Officer**  
**June 2022**



Section	Budget Heading	2021/22 Original Budget £	2021/22 Revised Expenditure £	2021/22 Revised Income £	2021/22 Revised Budget £	2021/22 Actual £	Variance between 21/22 Revised and 21/22 Outturn
Support to Land Managers	Access & Recreation	142,600	167,800	-27,500	140,300	135,553	-4,747
	Archaeology & Historic Environment	79,600	79,300	-1,200	78,100	73,622	-4,478
	Field Services	286,200	302,200	-23,500	278,700	275,914	-2,786
	Conservation Advice & Support	284,500	290,000	-4,000	286,000	311,160	25,160
	Rangers	100,400	122,900	-23,500	99,400	98,218	-1,182
<b>Support to Land Managers Total</b>		<b>893,300</b>	<b>962,200</b>	<b>-79,700</b>	<b>882,500</b>	<b>894,467</b>	<b>11,967</b>
Support services to the Community	Development Management	307,500	425,500	-88,000	337,500	337,814	314
	Rural Sustainability	87,900	86,700	0	86,700	86,947	247
<b>Support services to the Community Total</b>		<b>395,400</b>	<b>512,200</b>	<b>-88,000</b>	<b>424,200</b>	<b>424,761</b>	<b>561</b>
Support to National Park Users	Education & Volunteers	53,100	89,100	-2,000	87,100	88,848	1,748
	National Park & Information Centres	157,300	294,800	-137,500	157,300	155,210	-2,090
	Information & Interpretation Management	204,500	161,200	0	161,200	153,536	-7,664
	Pinkery	0	112,200	-112,200	0	4,391	4,391
	Visitor Facilities	21,400	91,400	-85,000	6,400	2,804	-3,596
<b>Support to National Park Users Total</b>		<b>436,300</b>	<b>748,700</b>	<b>-336,700</b>	<b>412,000</b>	<b>404,789</b>	<b>-7,211</b>
Corporate & Customer Support	Legal Support	70,000	75,000	0	75,000	86,414	11,414
	Strategy & Performance	325,500	316,500	0	316,500	314,350	-2,150
Finance and ICT Services	Finance and ICT Services	389,000	406,100	-16,000	390,100	386,316	-3,784
Land and Property Services	Land and Property Services	26,500	298,500	-252,000	46,500	42,421	-4,079
<b>Support Services Total</b>		<b>811,000</b>	<b>1,096,100</b>	<b>-268,000</b>	<b>828,100</b>	<b>829,501</b>	<b>1,401</b>
Corporate Management	Corporate Management	184,500	179,900	0	179,900	171,518	-8,382
	Historic Pensions Contributions	140,000	140,000	0	140,000	140,000	0
	Members	96,600	90,400	0	90,400	86,156	-4,244
<b>Corporate Management Total</b>		<b>421,100</b>	<b>410,300</b>	<b>0</b>	<b>410,300</b>	<b>397,674</b>	<b>-12,626</b>
<b>Total Core Budget</b>		<b>2,957,100</b>	<b>3,729,500</b>	<b>-772,400</b>	<b>2,957,100</b>	<b>2,951,193</b>	<b>-5,907</b>

**EXMOOR NATIONAL PARK AUTHORITY**  
**ANALYSIS OF PROGRAMMES, PARTNERSHIPS AND**  
**CONTRIBUTIONS TO RESERVES**

**ITEM 7.1 - Appendix 2**

**2021/22**

ORIGINAL BUDGET **254,400**

**Contributions to Reserves**

Woodlands	60,000
Estates Reserve - Lynmouth Pavilion external works	15,000
Estates Reserve - Pinkery Roof	70,000
Internship and Trainee Fund	10,000
	<u><b>155,000</b></u>

<b>Top sliced Programmes</b>	<b>Approval</b>	<b>Spend 2021/22</b>	<b>Balance Remaining</b>	<b>Treatment of Balance on the Scheme</b>
Tourism	20,000	11,850	8,150	Balance kept within Programmes - Top Sliced
Hill Farm Network	19,000	19,000	-	Approval all spent
Potential Pinkery overspend	20,000	10,000	10,000	Balance kept within Programmes - Top Sliced
Naturally Active in Later Life	5,000	5,000	-	Approval all spent
Website Development	5,000	-	5,000	Unallocated funds transferred to IT & Web Reserve
SERC/DBRC Bio-records	5,000	4,723	277	Unallocated funds transferred to General Balances
STEAM	4,000	3,700	300	Balance kept within Programmes - Top Sliced
Joint committee	1,400	1,400	-	Approval all spent
	<u><b>79,400</b></u>	<u><b>55,673</b></u>	<u><b>23,727</b></u>	

**Spend from Previous Year's Fixed Term Allocations** **22,472**

**Total Spend in 2021/22 on Fixed Term Priorities** **78,145**

<b>Small Grants Scheme - In year Approvals</b>	<b>Approval</b>	<b>Spend 2021/22</b>	<b>Balance Remaining</b>	<b>Treatment of Balance on the Scheme</b>
Moor Music (Two Moors Festival outreach)	2,500	-	2,500	Balance kept within Programmes - Small Grants
Unallocated budget	17,500	-	17,500	Unallocated funds transferred to General Balances
	<u><b>20,000</b></u>	<u><b>-</b></u>	<u><b>20,000</b></u>	

**Spend from Previous Year's Small Grants Allocations** **13,048**

**Total Spend in 2021/22 on Small Grants** **13,048**

**EXMOOR NATIONAL PARK AUTHORITY  
ANALYSIS OF RESERVES**

	Balance 31/03/21	2021/22 Budget Allocations	2021/22 In year Reserve Transfers	Transfers to Reserves 2021/22	Transfers from Reserves 2021/22	Outturn Transfers between Reserves 2021/22	Balance 31/03/22	2022/23 Budget Allocations	Projected Balance 01/04/22
	£	£	£	£	£	£	£	£	£
<b>REVENUE EARMARKED RESERVES</b>									
<b>Support to Land Managers</b>									
Ashcombe Garden Restoration	6,679				-5,237	2,500	3,942		3,942
Mire - Archaeology	29,758						29,758		29,758
Heritage Projects	22,617			7,000	-2,320	-2,000	25,297		25,297
Deer Monitoring Study	13,424						13,424		13,424
Woodland Mgt Reserve	17,516	60,000	30,000		-126,000	19,200	716	30,000	30,716
Ennis	6,117			10,411	-3,000		13,528		13,528
Tests & Trials	4,137				-4,137		(0)		(0)
Rights of Way	221,663			88,000	-110,000	7,000	206,663		206,663
Simonsbath Project Delivery	30,113				-29,385		728		728
<b>Support to National Park Users</b>									
Caremoor For Exmoor	71,792			422,492	-2,500	-31,700	460,084		460,084
National Park Centres spend to save	37,336		40,000	28,000			105,336		105,336
Get Involved Programme	4,745				-3,396		1,349		1,349
Toilet Upgrade Programme	15,000				-15,000		0		0
Health & Well-being	21,330				-14,327		7,003		7,003
Engagement & Outreach	25,911				-1,943		23,968		23,968
<b>Support to the Community and Business</b>									
Development of Planning Service	83,259				-62,700	30,000	50,559		50,559
Conserv Area Appraisals & Neighbourhd Plan	12,283						12,283		12,283
Dunster Action Plan	20,891						20,891		20,891
Rural Enterprise	70,586			34,600	-41,968		63,218		63,218
<b>Strategy &amp; Performance</b>									
Environmental Resilience	98,731				-33,650		65,081		65,081
IT and Web Development	55,875			5,000	-8,900	5,000	56,975		56,975
Corporate Equipment & Vehicle Replacement	170,625				-7,500		163,125	50,000	213,125
Planning Policy	145,356				-42,000		103,356		103,356
Research & Development	41,701				-12,800	-7,000	21,901		21,901
Modernisation	99,306						99,306		99,306
Internship and Trainee Fund	46,399	10,000			-9,406		46,993	10,000	56,993
Capital Development Reserve	0					100,000	100,000		100,000
Authority Estate	304,828	85,000		5,806	-113,600		282,034	25,000	307,034
	1,677,978	155,000	70,000	601,309	-649,769	123,000	1,977,518	115,000	2,092,518
<b>PROGRAMMES &amp; PARTNERSHIPS</b>									
Programmes - fixed term	157,609	79,400			-88,146	51,423	200,286	68,000	268,286
Partnership Fund/ small grants scheme	53,935	20,000			-13,048	-26,066	34,821	25,000	59,821
Programmes & Partnership Earmarked - County Gate	90,000					-60,000	30,000		30,000
	301,545	99,400	0	0	-101,194	-34,643	265,108	93,000	358,108
<b>GENERAL FUND AND CONTINGENCIES</b>									
General Fund	300,000			5,908		11,643	317,551		317,551
Contingency Fund - General (pf uncommit)	444,966		-70,000				374,966	-25,000	349,966
Contingency Fund - Legal	100,000						100,000		100,000
	844,965	0	-70,000	5,908	0	11,643	792,516	-25,000	767,516
<b>TOTAL RESERVES</b>	2,824,488	254,400	0	607,217	-750,963	100,000	3,035,142	183,000	3,218,142

Section	Budget Heading	2022/23 Month 2 net Spend	2022/23 Expenditure £	2022/23 Income £	2022/23 Original Budget £	2022/23 Anticipated Outturn
Support to Land Managers	Access & Recreation	18,860	157,700	-27,500	130,200	130,200
	Archaeology & Historic Environment	23,509	83,100	-1,200	81,900	81,900
	Field Services	57,304	321,900	-23,000	298,900	298,900
	Conservation Advice & Support	153,819	306,100	-4,000	302,100	302,100
	Rangers	19,659	125,200	-18,000	107,200	107,200
<b>Support to Land Managers Total</b>		<b>273,151</b>	<b>994,000</b>	<b>-73,700</b>	<b>920,300</b>	<b>920,300</b>
Support services to the Community	Development Management	54,078	403,100	-95,000	308,100	308,100
	Rural Sustainability	20,234	105,600	0	105,600	105,600
<b>Support services to the Community Total</b>		<b>74,312</b>	<b>508,700</b>	<b>-95,000</b>	<b>413,700</b>	<b>413,700</b>
Support to National Park Users	Education & Volunteers	14,882	97,500	-2,000	95,500	95,500
	National Park & Information Centres	54,068	298,700	-143,500	155,200	155,200
	Information & Interpretation Management	22,611	166,900	0	166,900	166,900
	Pinkery	13,937	140,000	-140,000	0	0
	Visitor Facilities	2,214	89,400	-80,000	9,400	9,400
<b>Support to National Park Users Total</b>		<b>107,712</b>	<b>792,500</b>	<b>-365,500</b>	<b>427,000</b>	<b>427,000</b>
Strategy & Performance	Legal Support	3,165	70,000	0	70,000	70,000
	Strategy & Performance	51,839	331,900	0	331,900	331,900
Finance and ICT Services	Finance and ICT Services	113,840	427,800	-16,000	411,800	411,800
Land and Property Services	Land and Property Services	83,675	272,700	-251,300	21,400	21,400
<b>Support Services Total</b>		<b>252,519</b>	<b>1,102,400</b>	<b>-267,300</b>	<b>835,100</b>	<b>835,100</b>
Corporate Management	Corporate Management	19,999	150,500	0	150,500	150,500
	Historic Pensions Contributions	0	150,000	0	150,000	150,000
	Corporate Subscriptions	15,300	33,400	0	33,400	33,400
	Members	13,988	98,500	0	98,500	98,500
<b>Corporate Management Total</b>		<b>49,287</b>	<b>432,400</b>	<b>0</b>	<b>432,400</b>	<b>432,400</b>
<b>Total Core Budget</b>		<b>756,981</b>	<b>3,830,000</b>	<b>-801,500</b>	<b>3,028,500</b>	<b>3,028,500</b>

## EXMOOR NATIONAL PARK AUTHORITY

5 July 2022

### 2021/22 OUTTURN – STATEMENT OF ACCOUNTS

#### Report of the Chief Finance Officer

**Purpose of Report:** To note the 2021/22 Statement of Accounts that will be presented to the External Auditors for audit.

**RECOMMENDATION:** The Authority is recommended to CONSIDER and NOTE the Statement of Accounts for 2021/22.

**Authority Priority:** Achieve by providing core services; getting best value from our resources and improving our performance.

**Legal and Equality Implications:** Local Government Act 2003, Parts 1-3 (Capital Finance, Financial Administration and Grants), Sections 1-39.

Accounts and Audit (England) Regulations 2011, Part 2 (Financial Management and Internal Control).

The equality and human rights impact of the recommendations of this report have been assessed as having no adverse impact on any particular group or individual.

**Financial and Risk Implications:** The financial and risk implications are shown throughout the report.

**Climate Change Implications:** Budgets for climate response work have been identified as part of the corporate planning and budgetary processes.

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## 1. Introduction

- 1.1 Before the pandemic the Accounts and Audit (England) Regulations 2015 have required the responsible Finance Officer to produce and certify the Statement of Accounts by 31 May and for the Authority to adopt the audited Statement of Accounts by 31 July. In Exmoor this responsibility is delegated from the Authority to the Final Accounts Committee. Due to the COVID-19 pandemic, these dates have been temporarily revised to 31 July for the draft accounts and a target date set of 30 November for final publication. This Authority has endeavoured to continue to publish the draft accounts as soon as was practicable.
- 1.2 The certified Statement of Accounts for 2021/22 that has been produced has been presented to the External Auditor for consideration. The Auditor is required to issue an audit report giving their:
- opinion on whether the financial statements presents a true and fair view of the financial position of the Authority as at 31 March 2022; and
  - conclusion on whether the Authority has put in place proper arrangements to secure economy, efficiency and effectiveness in its use of resources.

## **2. STATEMENT OF ACCOUNTS**

- 2.1 The format and content of the Statement of Accounts comply with the CIPFA Code of Practice on Local Authority Accounting in the United Kingdom 2021 (the Code) – and are required to present a true and fair view of the financial position of the Authority at 31 March 2022 and its comprehensive income and expenditure for the year ended 31 March 2022.
- 2.2 As Chief Finance Officer, I signed off the accounts on 22 June 2022.
- 2.3 Members of the Authority will note that the accounts have been prepared on a ‘going concern’ basis. This is based upon the fact that the Authority has a balanced MTFP, a robust budget setting process, ongoing funding streams and reserves that are adequate to meet challenges that arise. The ‘going concern’ basis assumes that the Authority will continue for the foreseeable future.
- 2.4 There are no significant changes to the structure of the accounts for 2021/22. Technical accounting changes that were due to be introduced were instead deferred.

**Gordon Bryant**  
**Chief Finance Officer**  
**June 2022**



# Exmoor National Park

## Statement Of Accounts 2021/22

**Gordon Bryant**  
Chief Finance Officer

**Sarah Bryan**  
Chief Executive



**UNAUDITED STATEMENT OF ACCOUNTS****2021/22****CONTENTS**

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## STATEMENT OF ACCOUNTS 2021/22

### NARRATIVE REPORT

#### Introduction

1. The Authority was created and given powers under the Environment Act 1995 and came into existence on 1 April 1997. The Act sets out two primary purposes for Exmoor National Park Authority ('the Authority'):
  - To conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park area; and
  - To promote opportunities for understanding and enjoyment of the National Park's special qualities.
2. In carrying out these purposes the Authority also has a duty to seek to foster the social and economic well-being of local communities in the National Park and is the Planning Authority under the Town and Country Planning Acts for the National Park area.
3. Exmoor National Park Authority is required under section 66(1) of the Environment Act 1995 to produce a National Park Management Plan (the 'Partnership Plan') and State of the Park report and review them every five years. The National Park Authority is responsible for preparing the Plan, but it is developed in consultation with partner organizations, communities, visitors and businesses and will be delivered with a wide range of partners. The fundamental basis for the Plan, and for the work of the National Park Authority, are the National Park statutory purposes and duty. Evidence from the updated State of the Park report forms an important basis for the review of the Partnership Plan, and ongoing monitoring. In April 2018 the [Partnership Plan](#) 2018-23 was published by the Authority. This sets out the Vision and Ambitions for the National Park under three themes of 'People, Place and Prosperity'.

#### Governance

4. The Annual Governance Statement is included within this publication but does not form part of the Authority's accounts. The Annual Governance Statement (AGS) is found at the back of this document and explains the:
  - Scope of responsibilities;
  - Governance Framework; and
  - Significant governance issues and challenges faced by the Authority.
5. The AGS also details the impact of the pandemic on governance in 2021/22. Authority meetings are now undertaken in 'hybrid' form where presenters are able to deliver remotely and members are present in person.
6. An enhanced governance relationship with Defra began in 2020/21. This included an annual formal agreement and additional reporting requirements.

7. The AGS also details significant governance issues that will be covered over the course of 2022/23. These include the transition to a new Financial Information System and the commitment to revise Financial Regulations.

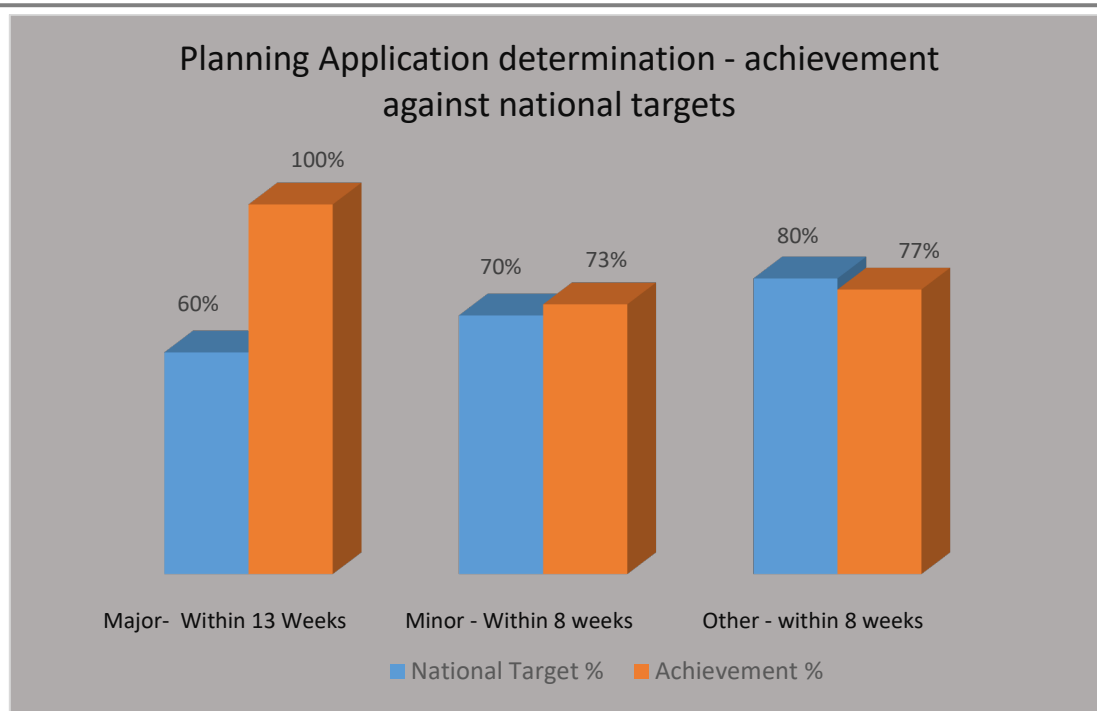
## Organisation

8. To achieve the purposes and duty described in 1 and 2, the organisation is structured in terms of Support to Land Managers, Support to National Park Users and Support to the Community and Business.

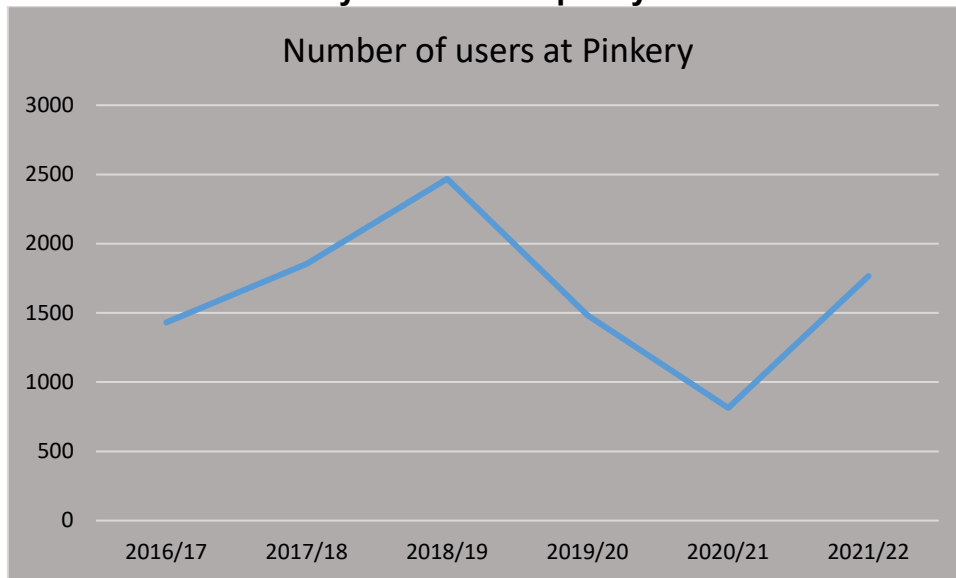
## Performance

9. 2021/22 saw the completion of the single year Corporate plan for the Authority. A mid-year report of progress in implementing the previous Corporate Plan was taken to the Authority in December 2021, and the full report went to the Authority in June 2022. <https://www.exmoor-nationalpark.gov.uk/about-us/meetings-agendas-reports/exmoor-national-park-authority/14-jun-2022/ar-enpa-14.06.22-Item-12.pdf>
10. Progress against key corporate indicators is given in the charts below. Performance is monitored quarterly by Leadership Team to ensure that the actions within the Corporate Plan are being achieved and, if necessary, to provide an opportunity for resources to be re-allocated or to review the proposed action.
11. For an analysis of performance in 2021/22 that goes beyond the Key Corporate Indicators please look to the Authority report in the link in paragraph 9.

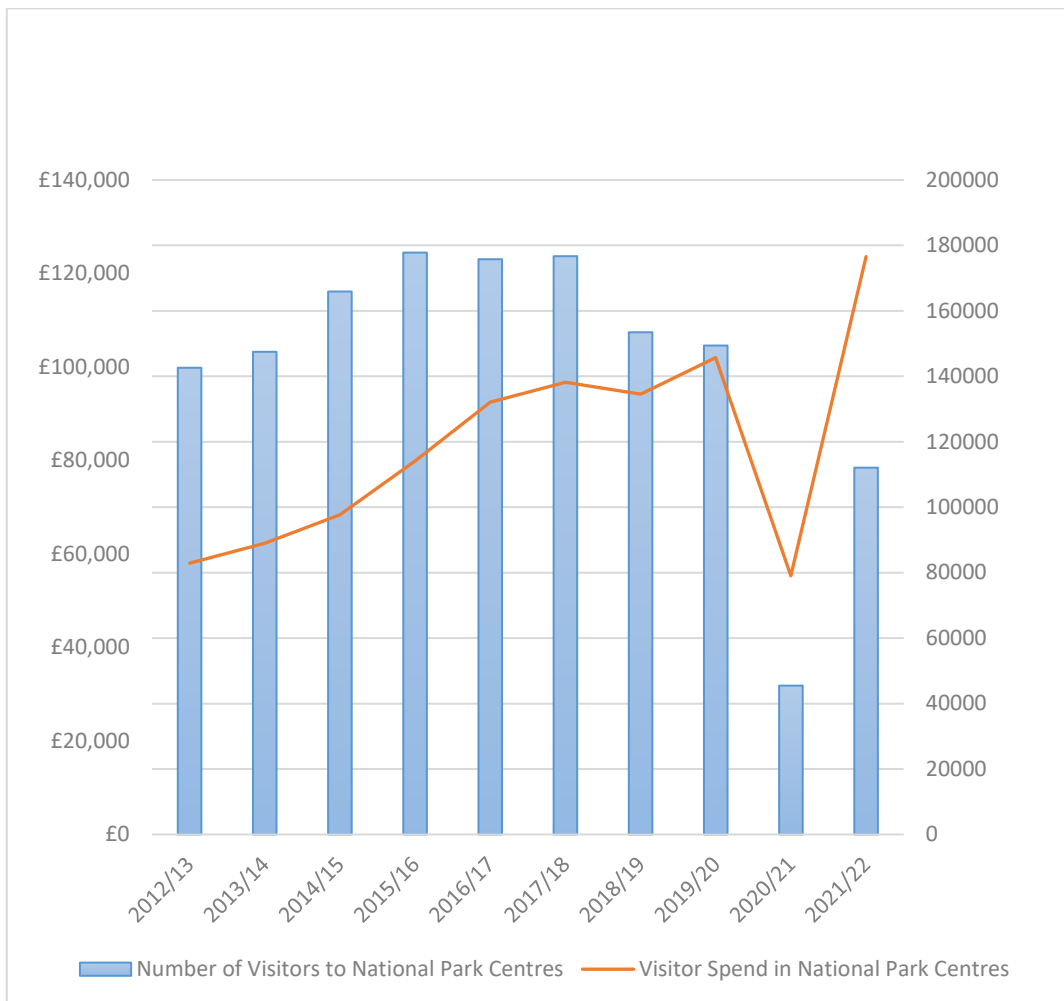
### Key Corporate Indicators 1 April 2021 to 31 March 2022



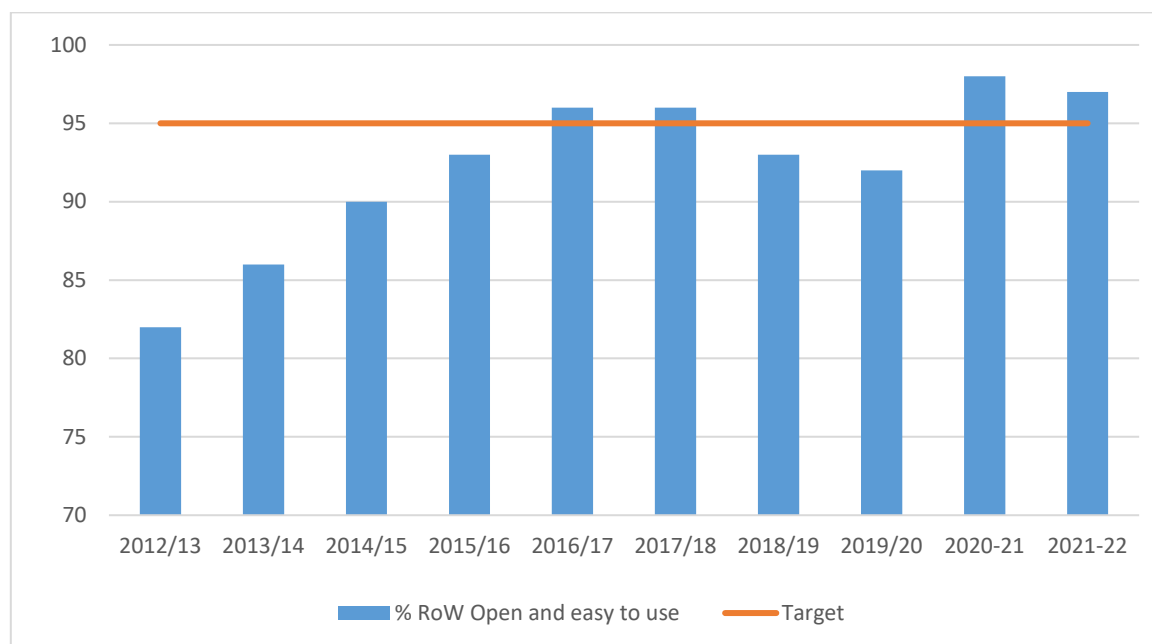
### Pinkery Centre Occupancy rates



### National Park Centre Visitor Numbers and Income Trend



## Rights of Way Open and Easy to Use Score



## Financial Statements

12. Information relating to financial performance for the year ended 31 March 2022 is contained in the following statements:

### **Comprehensive Income and Expenditure Statement (page 11);**

This statement shows the accounting cost in the year of providing services in accordance with generally accepted accounting practices, rather than the amount to be funded from taxation.

The Comprehensive Income & Expenditure Statement shows a surplus for 2021/22 of £2.323m. This contrasts with a deficit of £3.779m for 2020/21. 2021/22's surplus is due to a reduction in the pension fund liabilities and a small increase in values in our estate.

### **Movement in Reserves Statement (page 12);**

This statement shows the movement in the year on the different reserves held by the authority, analysed between 'usable' and other 'unusable' reserves. 'Usable' reserves are made up of Earmarked Reserves, General Fund Balances and Capital Receipts. The statement shows how the movements in year of the Authority's reserves are broken down between gains and losses incurred with generally accepted accounting practices and the statutory adjustments required to return the amounts chargeable to government grants for the year.

Usable reserves increased by £110k over the course of 2021/22 to £3.033m and unusable also increased over the same period by £2.213m to £7.430m. The increase in usable reserves is primarily due to the receipt of £400k of legacies in the year.

### **Balance Sheet (page 13)**

This statement shows the values as at the Balance Sheet date of the assets and liabilities recognised by the Authority. The net assets of the Authority (assets less liabilities) are matched by the reserves held by the Authority.

Exmoor has £10.463m of assets in excess of its liabilities at the end of 2021/22. This is an increase of £2.3m which is primarily due to the decrease in the pensions deficit. This decrease is primarily due to the increase in the value of our assets invested in the fund. The Authority owns £19.7m of Property, Plant and Equipment however many of these assets could not be realized at this level. Covenants attached to certain assets mean that they can only be sold to similar organizations and for the notional sum of £1.

### **Cash Flow Statement (page 14)**

The Cash Flow Statement shows the changes in cash and cash equivalents of the Authority during the reporting period. The statement shows how the Authority generates and uses cash and cash equivalents by classifying cash flows as operating, investing and financing activities.

The statement shows how the amount of Cash and Cash Equivalents decreased by £30k over the course of 2021/22.

## **Financial Performance**

13. The revenue budget for 2021/22 was agreed on the 2 March 2021. Resources were applied to meet the purposes and duty described in 1 and 2. The approved budget was constructed across two themes:
  - A Core Budget with expenditure of £3,738,300 and income of £781,200 giving a net requirement of £2,957,100.
  - A Partnership budget involving expenditure of £254,400 of which £79,400 was top sliced for priority elements, £20,000 set aside for small grants and £155,000 added to reserves.
  
14. When the 2021/22 budget was set, funds were prioritized for the new roof at the outdoor education centre, to clear trees affected by Ash Die-Back and to complete the external works at the Lynmouth Pavilion.
  
15. The Authority considered a revised budget and reviewed the elements of the budget at its meeting on 2 November 2021. Additional resources were found for refreshing the look of the National Park Centres and support Development Management's use of external contractors.
  
16. 2021/22 is notable for being the year when the Farming in Protected Landscapes programme began and over £300k was spent on our woodlands. In addition there was significant capital spend. This is show below:
  - £53k on the Visitor Facilities at Ashcombe.
  - £33k on secondary double glazing at Exmoor House.
  - £63k on the car park improvements at the Valley of Rocks.
  - £25k on the final bill for White Rock Cottage.
  - £52k on the establishment of Bye Wood.

17. The key recommendations to the Authority the year ended 31 March 2022 are:

- The establishment of the Capital Development Reserve. This will provide additional capacity and funding flexibility to finance spend that may facilitate capital spend or the development of assets but is not necessarily capitalizable.
- The revenue outturn for the year recommends that funds are redistributed towards the Web Development, NPCs Spend to Save and the Development of the Planning Service Reserves. Funding was also allocated to extend the Funding Officer and Historic Buildings Officer posts.
- The core budget shows an underspend for the year of £6k when compared with the revised budget. The reconciliation between this surplus and that shown in the Comprehensive Income and Expenditure Account is as follows:

	£000	£000
<b>Net Deficit on the Provision of Services in the Comprehensive Income &amp; Expenditure Account</b>		<b>492</b>
<i>Non Cash Transactions</i>		
Reverse Depreciation & Impairment charges	(36)	
Reverse IAS19 Pensions transactions	(821)	
Net transfers from earmarked reserves	104	
Asset written of on disposal	-	
Add in Capital Expenditure funded from Revenue	75	
Add in Capital Expenditure funded from Capital Grants	52	
Add in Capital Expenditure funded from Receipts	100	
Movement in Employee absence Accrual	24	
Upwards Revaluation of Assets	4	
<b>Management Accounts Budget Surplus</b>		<b>(6)</b>

18. 2021/22 was a more financially stable year than the previous two. The impact of the pandemic was reduced, and we have had time to prepare mitigations. The Authority has continued to perform well against the original and revised budgets set and shown the ability to adapt to be able to meet new challenges. The next great challenge is to meet budgetary pressures in the near term.

## Financial Outlook and Medium-Term Financial Plan

19. In recent years the Authority has been successful in managing resources and meeting obligations in the context of a slightly increasing or flat National Park Grant. This has effectively meant trimming budgets, increasing trading income and seeking external funding for larger schemes. This has been less than ideal but we have been able to maintain service provision.

20. We have recently been informed that the National Park Grant figures will be flat for 2022/23 and the next two financial years. This is very disappointing and has led to us having to increase our savings targets from those that were set when the budget was agreed. This is shown in the table below.

£'000s	2023/24	2024/25
Savings Gap in March 2022	68	103
Latest Savings Gap	132	233

21. It will clearly be major challenge to continue with our existing level of service provision and set balanced budgets. The Leadership Team has begun considering how this will be delivered.
22. We remain optimistic that the Authority will be able to deliver exciting conservation and engagement activities and meet our legal responsibilities in the future. The Authority has £900k of FiPL funds to deliver over the course of 2022/23 and 2023/24, has £450k from legacies and is seeking further investment from major funding bodies.
23. There will always be challenges arising and pressures to manage however, the Authority continues to maintain a solid financial position and opportunities from the Glover Review and new funding streams will also continue to arise.

G Bryant  
Chief Finance Officer  
June 2022

**STATEMENT OF ACCOUNTS 2021/22****2. STATEMENT OF RESPONSIBILITIES****2.1 The Authority's Responsibilities**

The Authority is required to:

- make arrangements for the proper administration of its financial affairs and to secure that one of its officers has the responsibility for the administration of those affairs. In this Authority that officer is the Chief Finance Officer.
- manage its affairs to secure economic, efficient and effective use of resources and to safeguard its assets; and
- approve the Statement of Accounts.

**2.2 The Chief Finance Officer's Responsibilities**

The Chief Finance Officer is responsible for the preparation of the Authority's Statement of Accounts in accordance with proper practices as set out in the CIPFA/LASAAC Code of Practice on Local Authority Accounting in the United Kingdom: A Statement of Recommended Practice (the Code).

In preparing this Statement of Accounts, the Chief Finance Officer has:

- selected suitable accounting policies and then applied them consistently;
- made judgements and estimates that were reasonable and prudent, and
- complied with the local authority Code.

The Chief Finance Officer has also:

- kept proper accounting records which were up to date; and
- taken reasonable steps for the prevention and detection of fraud and other irregularities.

**2.3 Chief Finance Officer's Certificate:**

**I certify that this Statement of Accounts has been prepared in accordance with the Accounts and Audit Regulations 2015 and that it gives a true and fair view of the financial position of Exmoor National Park Authority as at 31 March 2022 and its income and expenditure for the year ended 31 March 2022.**

**G Bryant**

**Chief Finance Officer: ..... Date: 22<sup>nd</sup> June 2022**



## Comprehensive Income and Expenditure Statement

This statement shows the accounting cost in the year of providing services in accordance with generally accepted accounting practices, rather than the amount to be funded from National Park Grant. National Park Authorities receive National Park Grant and raise other income to cover expenditure in accordance with statutory requirements; this may be different from the accounting cost. The taxation (government grant) position is shown in both the Expenditure and Funding Analysis and the Movement in Reserves Statement.

2020/21				2021/22		
Gross Expenditure £000	Gross Income £000 (Notes 10 & 11)	Net Expenditure £000		Gross Expenditure £000	Gross Income £000 (Notes 10 & 11)	Net Expenditure £000
1,685	(428)	1,257	Support to Land Managers	1,872	(658)	1,214
627	(224)	403	Support to the Community	648	(553)	95
283	(332)	(49)	Support to National Park Users	904	(456)	448
1,251	(271)	980	Support Services	1,547	(286)	1,261
264	-	264	Corporate Management	303	-	303
195	-	195	Partnership Fund	128	(20)	108
<b>4,305</b>	<b>(1,255)</b>	<b>3,050</b>	<b>Cost of Services</b>	<b>5,402</b>	<b>(1,973)</b>	<b>3,429</b>
8	(20)	(12)	Other Operating Expenditure (Note 12)	7	-	7
225	(17)	208	Financing and Investment Income and Expenditure (Note 13)	276	(9)	267
-	(3,211)	(3,211)	Taxation and Non-Specific Grant Income (Note 14)	-	(3,211)	(3,211)
<b>4,538</b>	<b>(4,503)</b>	<b>35</b>	<b>(Surplus)/Deficit on Provision of Services</b>	<b>5,685</b>	<b>(5,193)</b>	<b>492</b>
		(74)	(Surplus) or deficit on revaluation of Property, Plant and Equipment (Notes 22 & 23)			(163)
		3,818	Remeasurement of Net Defined Benefit Liability/ (Asset) (Note 34)			(2,652)
		<b>3,744</b>	<b>Other Comprehensive Income and Expenditure</b>			<b>(2,815)</b>
		<b>3,779</b>	<b>Total Comprehensive Income and Expenditure (Surplus)/Deficit</b>			<b>(2,323)</b>

## Movement in Reserves Statement

This statement shows the movement in the year on the different reserves held by the authority, analysed into 'General Fund Balance' (i.e. Earmarked Reserves and the General Fund proper which can be applied to fund expenditure) and other 'unusable' reserves. The statement shows how the movements in year of the Authority's reserves are broken down between gains and losses incurred with generally accepted accounting practices and the statutory adjustments required to return the amounts chargeable to government grants for the year. The Net Increase/Decrease line shows the statutory General Fund Balance movements in the year following those adjustments.

	General Fund Balance £000	Capital Receipts Unapplied £000	Total Usable reserves £000	Unusable Reserves £000	Total Authority Reserves £000
<b>Balance at 31 March 2020</b>	<b>2,884</b>	-	<b>2,884</b>	<b>9,035</b>	<b>11,919</b>
<b>Movement in reserves during 2020/21</b>					
Total Comprehensive Income and Expenditure	(35)	-	(35)	(3,744)	(3,779)
Adjustments between accounting basis & funding basis under regulations (Note 20)	(26)	100	74	(74)	-
<b>Net Increase/(Decrease)</b>	<b>(61)</b>	<b>100</b>	<b>39</b>	<b>(3,818)</b>	<b>(3,779)</b>
<b>Balance at 31 March 2021</b>	<b>2,823</b>	<b>100</b>	<b>2,923</b>	<b>5,217</b>	<b>8,140</b>
<b>Movement in reserves during 2021/22</b>					
Total Comprehensive Income and Expenditure	(492)	-	(492)	2,815	2,323
Adjustments between accounting basis & funding basis under regulations (Note 20)	702	(100)	602	(602)	-
<b>Increase/(Decrease) in 2021/22</b>	<b>210</b>	<b>(100)</b>	<b>110</b>	<b>2,213</b>	<b>2,323</b>
<b>Balance at 31 March 2022 (Notes 21 and 31)</b>	<b>3,033</b>	-	<b>3,033</b>	<b>7,430</b>	<b>10,463</b>

## Balance Sheet

The Balance Sheet shows the value as at the Balance Sheet date of the assets and liabilities recognised by the Authority. The net assets of the Authority (assets less liabilities) are matched by the reserves held by the Authority. Reserves are reported in two categories. The first category of reserves are usable reserves, i.e. those reserves the Authority may use to provide services, subject to the need to maintain a prudent level of reserves and any statutory limitations on their use (for example the Capital Receipts Reserve that may only be used to fund capital expenditure or repay debt). The second category of reserves is those that the Authority is not able to use to provide services. This category of reserves includes reserves that hold unrealised gains and losses (for example the Revaluation Reserve), where amounts would only become available to provide services if the assets are sold; and reserves that hold timing differences shown in the Movement in Reserves Statement line 'Adjustments between accounting basis and funding basis under regulations'.

31 March 2021 £000		Notes	31 March 2022 £000
19,281	Property, Plant & Equipment	22	19,638
92	Heritage Assets	23	92
<b>19,373</b>	<b>Long Term Assets</b>		<b>19,730</b>
67	Inventories	-	70
214	Short Term Debtors	26	485
2,900	Cash and Cash Equivalents	27	2,900
<b>3,181</b>	<b>Current Assets</b>		<b>3,455</b>
(8)	Receipts in Advance	-	(13)
(45)	Cash and Cash Equivalents	27	(75)
(288)	Short Term Creditors	28	(392)
<b>(341)</b>	<b>Current Liabilities</b>		<b>(480)</b>
(14,073)	Other Long-Term Liabilities	34	(12,242)
<b>(14,073)</b>	<b>Long Term Liabilities</b>		<b>(12,242)</b>
<b>8,140</b>	<b>Net Assets</b>		<b>10,463</b>
2,923	Usable Reserves	21,29	3,033
5,217	Unusable Reserves	31	7,430
<b>8,140</b>	<b>Total Reserves</b>		<b>10,463</b>

## Authorised for Issue

The un-audited Accounts were authorised for issue by the Chief Finance Officer on 22 June 2022.

## Cash Flow Statement

The Cash Flow Statement shows the changes in cash and cash equivalents of the Authority during the reporting period. The statement shows how the authority generates and uses cash and cash equivalents by classifying cash flows as operating, investing and financing activities. The amount of net cash flows arising from operating activities is a key indicator of the extent to which the operations of the Authority are funded by way of grant income or from the recipients of services provided by the Authority. Investing Activities represent the extent to which cash outflows have been made for resources which are intended to contribute to the Authority's future service delivery. Cash flows arising from financing activities are useful in predicating claims on future cash flows by providers of capital (i.e. borrowing) to the Authority.

<b>2020/21 £000</b>		<b>2021/22 £000</b>
<b>35</b>	<b>Net (surplus) or deficit on the Provision of Services</b>	<b>492</b>
	<i>Adjustments for-</i>	
(224)	Non Cash Movements (Note 36)	(689)
<b>(189)</b>	<b>Net Cash flows from Operating Activities</b>	<b>(197)</b>
97	Investing Activities (Note 37)	227
-	Financing Activities (Note 38)	-
<b>(92)</b>	<b>Net (increase)/decrease in Cash and Cash equivalents</b>	<b>30</b>
2,763	Cash and Cash Equivalents at the beginning of the reporting period	2,855
<b>2,855</b>	<b>Cash and Cash Equivalents at the end of the reporting period</b>	<b>2,825</b>
<b>(92)</b>	<b>Net (increase)/decrease in Cash and Cash equivalents</b>	<b>30</b>

**STATEMENT OF ACCOUNTS 2021/22****NOTES TO THE ACCOUNTS****Note 1: Accounting Policies****i General Principles**

The Statement of Accounts summarises the Authority's transactions for the 2021/22 financial year and its position at the year-end 31 March 2022. The Authority is required to prepare an annual Statement of Accounts by the Accounts and Audit Regulations 2015 in accordance with proper accounting practices. These practices under Section 21 of the 2003 Act primarily comprise the Code of Practice on Local Authority Accounting in the UK 2021/22 (The Code) supported by International Financial Reporting Standards (IRFS) and statutory guidance issued under section 12 of the 2003 Act.

The Statement of Accounts has been prepared using the going concern and accrual basis. The historical cost convention has been applied, modified by the revaluation of certain categories of non-current assets and financial instruments.

**ii Accruals of Income and Expenditure**

Activity is accounted for in the year it takes place, not simply when cash payments are made or received. In particular:

- Revenue from the sale of goods is recognised when the Authority transfers the significant risks and rewards of ownership to the purchaser and it is probable that economic benefits or service potential associated with the transaction will flow to the Authority.
- Revenue from the provision of services is recognised when the Authority can measure reliably the percentage of completion of the transaction and it is probable that economic benefits or service potential associated with the transaction will flow to the Authority.
- Supplies are recorded as expenditure when they are consumed – where there is a gap between the date supplies are received and their consumption, they are carried as inventories on the Balance Sheet.
- Expenses in relation to services received (including services provided by employees) are recorded as expenditure when the services are received rather than when payments are made.
- Interest receivable on investments and payable on borrowings is accounted for respectively as income and expenditure on the basis of the effective interest rate for the relevant financial instrument rather than the cash flows or determined by the contract.
- Where revenue and expenditure have been recognised but cash has not been received or paid, a debtor or creditor for the relevant amount is recorded in the Balance Sheet. Where debts may not be settled, the balance of debtors is written down and a charge made to revenue for the income that might not be collected.
- Small amounts outstanding at year end are treated on a payments basis. In total, these do not have a material effect on the year's accounts.

### iii **Cash and Cash Equivalents (Note 27)**

Cash is represented by cash in hand and deposits with financial institutions repayable without penalty on notice of not more than 24 hours. Cash equivalents are investments that mature in no more than three months or less from the date of acquisition and that are readily convertible to known amounts of cash with insignificant risk of change in value. In the Cash Flow Statement, cash and cash equivalents are shown net of bank overdrafts that are repayable on demand and form an integral part of the Authority's cash management.

### iv **Prior Period Adjustments, Changes in Accounting Policies and Estimates and Errors**

Prior period adjustments may arise as a result of a change in accounting policies or to correct a material error. Changes in accounting estimates are accounted for prospectively i.e. in the current and future years affected by the change and do not give rise to a prior period adjustment. Changes in accounting policies are only made when required by proper accounting practices or the change provides more reliable or relevant information about the effect of transactions, other events and conditions on the Authority's financial position or financial performance. Where a change is made, it is applied retrospectively (unless stated otherwise) by adjusting opening balances and comparative amounts for the prior period as if the new policy had always been applied. Material errors discovered in prior period figures are corrected retrospectively by amending opening balances and comparative amounts for the prior period.

### v **Charges to Revenue for Non-Current Assets**

Services and support services are debited with the following amounts to record the cost of holding fixed assets during the year:

- depreciation attributable to the assets used by the relevant service
- revaluation and impairment losses on assets used by the service where there are no accumulated gains in the Revaluation Reserve against which the losses can be written off.

### vi **Employee Benefits (Notes 16,34)**

#### Benefits Payable During Employment

Short-term employee benefits are those due to be settled within 12 months of the year-end. They include such benefits as wages and salaries, paid annual leave and paid sick leave, bonuses and non-monetary benefits (e.g. cars) for current employees and are recognised as an expense for services in the year in which employees render service to the Authority. An accrual is made for the cost of holiday entitlements (or any form of leave e.g. time off in lieu) earned by employees but not taken before the year-end which employees can carry forward into the next financial year. The accrual is made at the wage and salary rates applicable in the following accounting year, being the period in which the employee takes the benefit. The accrual is charged to Surplus or Deficit on the Provision of Services, but then reversed out through the Movement in Reserves Statement so that holiday benefits are charged to revenue in the financial year in which the holiday absence occurs.

#### Termination Benefits

Termination benefits are amounts payable as a result of a decision by the Authority to terminate an officer's employment before the normal retirement date or an officer's decision to accept voluntary redundancy and are charged on an accruals basis to the Service lines in the Comprehensive Income and Expenditure Statement when the Authority is demonstrably committed to the termination of the employment of an officer or group of officers or making an offer to encourage voluntary redundancy.

Where termination benefits involve the enhancement of pensions, statutory provisions require the General Fund balance to be charged with the amount payable

by the Authority to the pension fund or pensioner in the year, not the amount calculated according to the relevant accounting standards. In the Movement in Reserves Statement, appropriations are required to and from the Pensions Reserve to remove the notional debits and credits for pension enhancement termination benefits and to replace them with debits for the cash paid to the pension fund and pensioners and any such amounts payable at the year-end.

#### Post Employment Benefits

Most employees of the Authority are members of the following pension scheme:

- The Local Government Pensions Scheme, administered by Peninsula Pensions.

The scheme provides defined benefits to members (retirement lump sums and pensions), earned as employees who worked for the Authority.

#### *The Local Government Pension Scheme*

**The Local Government Scheme is accounted for as a defined benefits scheme:**

- The liabilities of the SCC LGPS pension fund attributable to the Authority are included in the Balance Sheet on an actuarial basis using the projected unit method – i.e. an assessment of the future payments that will be made in relation to retirement benefits earned to date by employees, based on assumptions about mortality rates, employee turnover rates, etc. and projections of earnings for current employees.
- Liabilities are discounted to their value at current prices, using a discount rate based on the indicative rate of return on high quality corporate bond (annualised yield at the 20-year point on the Merrill Lynch AA-rated corporate bond yield curve).
- The assets of SCC pension fund attributable to the Authority are included in the Balance Sheet at their fair values.
  - quoted securities – current bid price
  - unquoted securities – professional estimate
  - unitised securities – current bid price
  - property – market value
- The change in the net pensions liability is analysed into seven components:
- **Service Cost comprising:**
  - Current service cost: the increase in liabilities as a result of years of service earned this year which is allocated in the Comprehensive Income and Expenditure Statement to the services for which the employees worked.
  - Past service cost: the increase in liabilities as a result of a scheme amendment or curtailment whose effect relates to years of service earned in earlier years will be debited to the Surplus or Deficit on the Provision of Services in the Comprehensive Income and Expenditure Statement as part of Non-Distributed Costs.
  - Net interest on the defined liability: i.e. net interest expense for the authority – the change during the period in the net defined liability that arises from the passage of time charged to the Financing and Investment Income and Expenditure line of the Comprehensive Income and Expenditure Statement. This is calculated by applying the discount rate used to measure the defined benefit obligation at the beginning of the period to the net defined liability at the beginning of the period, taking into account any changes in the net defined liability during the period as a result of contribution and benefit payments.

- **Remeasurement comprising:**
  - The return on plan assets: excluding amounts included in net interest on the net defined liability – charged to the Pensions Reserve as Other Comprehensive Income and Expenditure.
  - Actuarial gains and losses: changes in the net pensions liability that arise because events have not coincided with assumptions made at the last actuarial valuation or because the actuaries have updated their assumptions – charged to the Pensions Reserve as Other Comprehensive Income and Expenditure.
- Contributions paid to the Somerset County Council pension fund:
  - Cash paid as employer’s contributions to the pension fund in settlement of liabilities; not accounted for as an expense.

In relation to retirement benefits, statutory provisions require the General Fund balance to be charged with the amount payable by the Authority to the pension fund or directly to pensioners in the year, not the amount calculated according to the relevant accounting standards. In the Movement in Reserves Statement, this means that there are appropriations to and from the Pensions Reserve to remove the notional debits and credits for retirement benefits and replace them with debits for the cash paid to the pension fund and pensioners and any such amounts payable but unpaid at the year-end. The negative balance that arises on the Pensions Reserve thereby measures the beneficial impact to the General Fund of being required to account for retirement benefits on the basis of cash flows rather than as benefits are earned by employees.

*Discretionary Benefits*

The Authority also has restricted powers to make discretionary awards of retirement benefits in the event of early retirements. Any liabilities estimated to arise as a result of an award to any member of staff are accrued in the year of the decision to make the award and accounted for using the same policies as are applied to the Local Government Pension Scheme.

vii **Events After the Balance Sheet Date (Note 6)**

Events after the balance sheet date are those events, both favourable and unfavourable, that occur between the end of the reporting period and the date when the Statement of Accounts is authorised for issue. Two types of events can be identified:

- those that provide evidence of conditions that existed at the end of the reporting period – the Statement of Accounts is adjusted to reflect such events
- those that are indicative of conditions that arose after the reporting period – the Statement of Accounts is not adjusted to reflect such events, but where a category of events would have a material effect, disclosure is made in the notes of the nature of events and their estimated financial effect.

Events taking place after the date of authorisation for issue are not reflected in the Statement of Accounts.

viii **Financial Instruments (Notes 25)**

Financial liabilities are recognised on the Balance Sheet when the Authority becomes a party to the contractual provisions of a financial instrument and are initially measured at fair value and are carried at their amortised cost.

Financial assets are classified on a classification and measurement approach that reflects the business model for holding the financial assets and their cashflow characteristics: there are three main classes of financial assets measured at:



- Amortised cost
- Fair value through profit and loss (none)
- Fair value through other comprehensive income (none)

Our business model is to hold investments to collect contractual cashflows. Financial assets are therefore classified at amortised cost (bank deposits and debtors).

Financial assets measured at amortised cost are recognised in the Balance Sheet when we become party to the contractual provisions of the instrument and are initially measured at fair value. They are subsequently measured at their amortised cost. Annual credits are made to the Financing and Investment Income and Expenditure line in the CIES for interest receivable, based on the carrying amount of the asset multiplied by the effective rate of interest for the instrument. Any gains and losses that arise on derecognition are credited or debited to the Financing and Investment Income and Expenditure line in the CIES.

Expected Credit Loss Model - we recognise expected credit losses on financial assets held at amortised cost either on a 12-month or lifetime basis and also applies to lease receivables and contract assets. Only lifetime losses are recognised for trade receivables (debtors). Impairment losses are calculated to reflect the expectation that the future cash flows might not take place due to default. Credit risk plays an important part in assessing losses. Where risk has increased significantly since initial recognition, losses are assessed on a life-time basis. Where risk has not increased significantly or remains low, losses are assessed on the basis of 12 month expected losses. If expected losses are not material then no allowance will be made.

**ix Government Grants and Contributions (Note 19)**

Whether paid on account, by instalments or in arrears, government grants and third party contributions and donations are recognised as due to the Authority when there is reasonable assurance that:

- the Authority will comply with the conditions attached to the payments and
- the grants or contributions will be received.

Monies advanced as grants and contributions for which conditions have not been satisfied are carried in the Balance Sheet as creditors. When conditions are satisfied, the grant or contribution is credited to the relevant service line (attributable revenue grants and contributions) or Taxation and Non-Specific Grant Income (non-ring-fenced revenue grants and all capital grants) in the Comprehensive Income and Expenditure Statement.

**x Inventories**

Inventories held for resale at the three National Park Centres are included in the Balance Sheet at cost. The cost of inventories is assigned using the weighted average costing formula.

**xi Property, Plant and Equipment (Note 22)**

Assets that have physical substance and are held for use in the production or supply of goods or services, for rental to others, or for administrative purposes and that are expected to be used during more than one financial year are classified as Property, Plant and Equipment.

Recognition

Expenditure on the acquisition, creation or enhancement of Property, Plant and Equipment is capitalised on an accruals basis provided that it is probable that the future economic benefits or service potential associated with the item will flow to the Authority and the cost of the item can be measured reliably. Expenditure that maintains but does not add to an asset's potential to deliver future economic benefits

or service potential (i.e. repairs and maintenance) is charged as an expense when it is incurred.

### De-minimus

Expenditure below £5,000 on property, plant and equipment is treated as revenue expenditure and is charged to the relevant service line in the Comprehensive Income & Expenditure Statement in the year that it is incurred.

### Measurement

Assets are initially measured at cost, comprising the purchase price and any costs attributable to bringing the asset to the location and condition necessary for it to be capable of operating in the manner intended by management.

The cost of assets acquired other than by purchase is deemed to be its fair value, unless the acquisition does not have commercial substance (i.e. it will not lead to a variation in the cash flows of the Authority).

Assets are then carried in the Balance Sheet using the following measurement bases:

- infrastructure, community assets and assets under construction – depreciated historical cost
- all other assets – fair value, determined as the amount that would be paid for the asset in its existing use (existing use value – EUV)

Where there is no market-based evidence of fair value because of the specialist nature of an asset, depreciated replacement cost (DRC) is used as an estimate of fair value. Where non-property assets that have short useful lives or low values (or both), depreciated historical cost basis is used as a proxy for fair value.

Assets included in the Balance Sheet at fair value are revalued sufficiently regularly to ensure that their carrying amount is not materially different from their fair value at the year-end, but as a minimum every five years. Increases in valuations are matched by credits to the Revaluation Reserve to recognise unrealised gains.

Where decreases in value are identified, they are accounted for by:

- where there is a balance of revaluation gains for the asset in the Revaluation Reserve, the carrying amount of the asset is written down against that balance (up to the amount of the accumulated gains)
- where there is no balance in the Revaluation Reserve or an insufficient balance, the carrying amount of the asset is written down against the relevant service line(s) in the Comprehensive Income and Expenditure Statement.

The Revaluation Reserve contains revaluation gains recognised since 1 April 2007 only, the date of its formal implementation. Gains arising before that date have been consolidated into the Capital Adjustment Account.

### Impairment

Assets are assessed at each year-end as to whether there is any indication that an asset may be impaired. Where indications exist and any possible differences are estimated to be material, the recoverable amount of the asset is estimated and, where this is less than the carrying amount of the asset, an impairment loss is recognised for the shortfall.

Where impairment losses are identified, they are accounted for by:

- where there is a balance of revaluation gains for the asset in the Revaluation Reserve, the carrying amount of the asset is written down against that balance (up to the amount of the accumulated gains)
- where there is no balance in the Revaluation Reserve or an insufficient balance, the carrying amount of the asset is written down against the relevant service line(s) in the Comprehensive Income and Expenditure Statement.

Where an impairment loss is reversed subsequently, the reversal is credited to the relevant service line(s) in the Comprehensive Income and Expenditure Statement, up to the amount of the original loss, adjusted for depreciation that would have been charged if the loss had not been recognised.

### Depreciation

Depreciation is provided for on all Property, Plant and Equipment assets by the systematic allocation of their depreciable amounts over their useful lives. An exception is made for assets without a determinable finite useful life (i.e. freehold land and certain Community Assets) and assets that are not yet available for use (i.e. assets under construction).

Depreciation is calculated on the following bases:

- dwellings and other buildings – straight-line allocation over the useful life of the property as estimated by the valuer
- vehicles, plant, furniture and equipment – straight-line allocation over the useful life of the asset

Revaluation gains are also depreciated, with an amount equal to the difference between current value depreciation charged on assets and the depreciation that would have been chargeable based on their historical cost being transferred each year from the Revaluation Reserve to the Capital Adjustment Account.

### Disposals

Where an asset is disposed of or decommissioned, the carrying amount of the asset in the Balance Sheet (whether Property, Plant and Equipment or Assets Held for Sale) is written off to the Other Operating Expenditure line in the Comprehensive Income and Expenditure Statement as part of the gain or loss on disposal. Receipts from disposals (if any) are credited to the same line in the Comprehensive Income and Expenditure Statement also as part of the gain or loss on disposal (i.e. netted off against the carrying value of the asset at the time of disposal). Any revaluation gains accumulated for the asset in the Revaluation Reserve are transferred to the Capital Adjustment Account.

Amounts received for a disposal in excess of £10,000 are categorised as capital receipts. The balance of receipts is required to be credited to the Capital Receipts Reserve and can then only be used for new capital investment or set aside to reduce the Authority's underlying need to borrow (the capital financing requirement) (England and Wales)]. Receipts are appropriated to the Reserve from the General Fund Balance in the Movement in Reserves Statement.

The written-off value of disposals is not a charge against National Park Grant, as the cost of fixed assets is fully provided for under separate arrangements for capital financing. Amounts are appropriated to the Capital Adjustment Account from the General Fund Balance in the Movement in Reserves Statement.

### Non-current assets-held-for-sale

When it becomes probable that the carrying amount of an asset will be recovered principally through a sale transaction rather than through its continuing use, it is reclassified as an asset-held-for-sale. The asset is revalued immediately before reclassification and then carried at the lower of this amount and fair value less costs to sell.

## xii **Contingent Liabilities and Contingent Assets (Note 35)**

### Contingent Assets

Contingent assets are disclosed by way of note where it is probable that there will be an inflow of economic benefits or service potential.

A contingent asset arises where an event has taken place that gives the Authority a possible asset whose existence will only be confirmed by the occurrence or otherwise of uncertain future events not wholly within the control of the Authority.

### Contingent Liabilities

A contingent liability arises where an event has taken place that gives the authority a possible obligation whose existence will only be confirmed by the occurrence or otherwise of uncertain future events not wholly within the control of the authority. Contingent liabilities also arise in circumstances where a provision would otherwise be made but either it is not probable that an outflow of resources will be required or the amount of the obligation cannot be measured reliably.

Contingent liabilities are not recognised in the Balance Sheet but disclosed in a note to the accounts.

## xiii **Reserves (Notes 20, 21, 29, 31)**

The Authority sets aside specific amounts as reserves for future purposes or to cover contingencies. Reserves are created by appropriating amounts out of the General Fund Balance in the Movement in Reserves Statement. When expenditure to be financed from a reserve is incurred, it is charged to the appropriate service in that year to score against the Surplus or Deficit on the Provision of Services in the Comprehensive Income and Expenditure Statement. The reserve is then appropriated back into the General Fund Balance in the Movement in Reserves Statement so that there is no net charge against National Park Grant for the expenditure.

Certain reserves are kept to manage the accounting processes for non-current assets, financial instruments, retirement and employee benefits and do not represent usable resources for the Authority.

## xiv **Heritage Assets (Note 23)**

The Authority's Heritage Assets are assets held by the Authority principally for their contribution to knowledge and/or culture. They are recognised and measured in accordance with the Authority's accounting policies on Property, Plant and Equipment. The authority only recognises two Heritage Assets; the Brendon Hill Incline and the Simonsbath Sawmill. Both of these are valued at Existing Use Value.

## **Note 2: Accounting Standards that have been issued but have not yet been adopted**

The 2021/22 Code of Practice on Local Authority Accounting requires the Authority to identify any accounting standards that have been issued and are due to be adopted for the next financial year's accounts. The Code also requires that changes in accounting policy are to be applied retrospectively unless transitional arrangements are specified, this would result in an impact on disclosures spanning two financial years.

The following accounting changes are likely to be introduced in the 2022/23 Statement of Accounts.

- IFRS 1 First Time Adoption of IFRS – subsidiary as a first-time adopter
- IAS 37 Provisions, Contingent Assets and Contingent Liabilities - specification of costs to be included when assessing whether a contract will be onerous
- IFRS 16 Leases – lease incentives
- IAS 41 Agriculture – taxation in fair value measurements
- IAS 16 Property, Plant and Equipment - proceeds before intended use

None of these changes in accounting requirements for 2022/23 are anticipated to have a material impact on the Council's financial performance or financial position.

## **Note 3: Material Items of Income and Expenditure**

There are no material items to disclose in 2021/22.

## **Note 4: Critical Judgements in Applying Accounting Policies**

In applying the accounting policies set out within the notes in the Statement of Accounts the Authority has had to make certain judgements about complex transactions or those involving uncertainty about future events. The critical judgements made in the Statement of Accounts are:

- a) Estimates for accrued expenditure/income - based on Service Managers' and Accountants' calculations at year end.
- b) Asset lives for the calculation of depreciation charges – based on Service Managers' experience of previously used assets.
- c) The Authority has also placed reliance on technical estimates supplied by third parties for the following:
  - Property valuations made by NPS
  - Pension valuations supplied by Barnett Waddingham - Actuary engaged by Somerset County Council.

The Authority has received very detailed reports from both of these sources outlining overall valuations and all of the key assumptions made in arriving at these final figures. These reports will be examined by Grant Thornton during their audit of the Authority's Accounts.

- d) The accounts have been prepared on a going-concern basis. The concept of going concern assumes that the Authority, its functions and services will continue in operational existence for the foreseeable future. There is no indication that Defra or Central Government intends to abolish National Park Authorities.

## **Note 5: Assumptions Made About the Future and Other Major Sources of Estimation**

The Statement of Accounts contains estimated figures that are based on assumptions made by the Authority about the future or that are otherwise uncertain. Estimates are made taking into account historical experience, current trends and other relevant factors. However, because balances cannot be determined with certainty, actual results could be materially different from the assumptions and estimates.

There are three items in the Authority's Balance Sheet as at 31 March 2022, for which there is a significant risk of material adjustment in forthcoming financial years. They are as follows:

Item	Uncertainties	Effect if Actual Results Differ from Assumptions
<b>Pensions Liability</b>	Estimation of the net liability to pay pensions depends on a number of complex judgements relating to the discount rate used, the rate at which salaries are projected to increase, changes in retirement ages, mortality rates and expected returns on pension fund assets. A firm of actuaries is engaged to provide the Authority with expert advice about the assumptions to be applied.	The effects of the net pension liability of changes in individual assumptions can be measured. For instance, a 0.1% increase in the discount rate assumption would result in a decrease in the pension liability of £609K. However the assumptions interact in complex ways. During 2021/22, the Authority's actuaries advised that due to estimates being adjusted (as a result of experience and updating the assumptions) the net pension liability had decreased by £1.8m.
<b>Property Plant and Equipment - Asset Lives</b>	Assets are depreciated over useful lives that are dependent upon assumptions about the level of repairs and maintenance that will be incurred in relation to individual assets. The current economic climate makes it uncertain that the Authority will be able to sustain its current spending on repairs and maintenance, bringing into doubt the useful lives assigned to assets.	If the useful life of an asset is reduced, depreciation increases and the carrying amount of the asset falls. It is estimated that the annual depreciation charge for buildings and plant based on a gross value of £4.7m for all depreciated properties would increase by £1k for every year that useful lives had to be reduced.
<b>Property Plant and Equipment - Valuation</b>	The Authority engages a qualified Royal Institution of Chartered Surveyors (RICS) surveyor from NPS, to provide valuations of land and property assets at the year end. The values of assets are adjusted to their current values by reviewing the sales of similar assets in the region, applying indexation and considering impairment of individual assets. The valuer works closely with the finance staff on all valuation matters.	Significant changes in the assumptions of future income streams/growth, occupancy levels, ongoing property maintenance and other factors would result in a significantly higher or lower fair value measurement for these assets. In particular, the pandemic and the measures taken to tackle Covid-19 continue to affect economies and real estate markets globally. Nevertheless, an adequate quantum of market evidence exists upon which to base opinions of value.

#### **Note 6: Events after the Balance Sheet Date**

The Statement of Accounts was authorised for issue by the Chief Finance Officer on 22 June 2022. Events taking place after this date are not reflected in the financial statements or notes. Where events taking place before this date provided information about conditions existing at 31 March 2022, the figures in the financial statements and notes have been adjusted in all material respects to reflect the impact of this information.

On the 31 May 2022 the Authority took possession of a property that is owned by someone who owes the Authority in excess of £130k over a long running planning dispute. When the

property has been sold the debt will be settled and the relevant proceeds will be credited to the Authority.

### **Note 7: Related Parties**

The Authority is required to disclose material transactions with related parties – bodies or individuals that have the potential to control or influence the Authority or to be controlled or influenced by the Authority. Disclosure of these transactions allows readers to assess the extent to which the Authority might have been constrained in its ability to operate independently or might have secured the ability to limit another party's ability to bargain freely with the Authority.

#### *Central Government*

Central government has effective control over the general operations of the Authority – it is responsible for providing the statutory framework within which the Authority operates, provides the majority of its funding in the form of grants. Grants received from government departments are set out in the subjective analysis in Note 19 on Grant Income.

#### *Members*

Members of the Authority have direct control over the Authority's financial and operating policies. 12 of the Authority's members are also elected members of other local authorities within Devon and Somerset. The Authority's Standing Orders requires a register to be kept of members disclosable pecuniary interests and declarations of related party transactions in a register of interests. In addition members are asked to declare separately any transactions with the Authority. A summary of the Members' allowances paid in 2021/22 is shown in Note 15.

#### *Officers*

Officers of the Authority are bound by the Authority's Code of Conduct which seeks to prevent related parties exerting undue influence over the Authority. Senior Officers are required to declare any transactions with the Authority. No transactions have been disclosed.

The Authority's transactions with the Somerset County Council Pension Fund are detailed within Note 34 to the Financial Statements.

### **Note 8: Expenditure and Funding Analysis**

The Expenditure and Funding Analysis shows how annual expenditure is used and funded from resources (government grants, other grants and contributions, sales, fees and charges) by the Authority in comparison with those resources consumed or earned by the Authority in accordance with generally accepted accounting practices. It also shows how this expenditure is allocated for decision making purposes between the Authority's service areas. Income and expenditure accounted for under generally accepted accounting practices is presented more fully in the Comprehensive Income and Expenditure Statement.

2020/21				2021/22		
Net Expenditure Chargeable to the General Fund £000	Adjustments between Funding & Accounting basis £000 (Note 8)	Net Expenditure in the CI&ES £000		Net Expenditure Chargeable to the General Fund £000	Adjustments between Funding & Accounting basis £000 (Note 8)	Net Expenditure in the CI&ES £000
1,075	182	1,257	Support to Land Managers	1,072	142	1,214
376	27	403	Support to the Community	80	15	95
442	(491)	(49)	Support to National Park Users	512	(64)	448
867	113	980	Support Services	1,097	164	1,261
247	17	264	Corporate Management	258	45	303
182	13	195	Partnership Fund	91	17	108
<b>3,189</b>	<b>(139)</b>	<b>3,050</b>	<b>Net Cost of Services</b>	<b>3,110</b>	<b>319</b>	<b>3,429</b>
(3,128)	113	(3,015)	Other Income & Expenditure	(3,320)	383	(2,937)
<b>61</b>	<b>(26)</b>	<b>35</b>	<b>(Surplus)/Deficit on Provision of Services</b>	<b>(210)</b>	<b>702</b>	<b>492</b>
<b>(2,884)</b>			<b>Opening General Fund Balance</b>	<b>(2,823)</b>		
61			Deficit/ (surplus) on General Fund in Year	(210)		
<b>(2,823)</b>			<b>Closing General Fund Balance</b>	<b>(3,033)</b>		

### Note 9: Note to the Expenditure and Funding Analysis

Adjustments between the Funding and Accounting Basis 2021/22.

Adjustments from the General Fund to arrive at the CIES amounts	Adjustments for Capital Purposes (note a)	Net change for Pensions Adjustment (note b)	Other Differences (note c)	Total Adjustments
	£000	£000	£000	£000
Support to Land Managers	(40)	191	(9)	142
Support to the Community	1	15	(1)	15
Support to National Park Users	(133)	72	(3)	(64)
Support Services	(23)	195	(8)	164
Corporate Management	-	47	(2)	45
Partnership Fund	-	18	(1)	17
<b>Net Cost of Services</b>	<b>(195)</b>	<b>538</b>	<b>(24)</b>	<b>319</b>
Other Income & Expenditure	100	283	-	383
<b>Surplus/ Deficit on the Provision of Services</b>	<b>(95)</b>	<b>821</b>	<b>(24)</b>	<b>702</b>



Adjustments between the Funding and Accounting Basis 2020/21

Adjustments from the General Fund to arrive at the CIES amounts	Adjustments for Capital Purposes (note a)	Net change for Pensions Adjustment (note b)	Other Differences (note c)	Total Adjustments
	£000	£000	£000	£000
Support to Land Managers	116	57	9	182
Support to the Community	1	22	4	27
Support to National Park Users	(521)	26	4	(491)
Support Services	52	53	8	113
Corporate Management		15	2	17
Partnership Fund		11	2	13
<b>Net Cost of Services</b>	<b>(352)</b>	<b>184</b>	<b>29</b>	<b>(139)</b>
Other Income & Expenditure	(120)	233	-	113
<b>Surplus/ Deficit on the Provision of Services</b>	<b>(472)</b>	<b>417</b>	<b>29</b>	<b>(26)</b>

**a) Adjustments for Capital Purposes** - this column adds in depreciation and impairment, financing and revaluation gains and losses in the services line

**b) Net Change for Pensions Adjustments** - Net change for removal of pension contributions and the addition of IAS19 Employee Benefits pension related expenditure and income:

- **For services** - this represents removal of the employer pension contributions made by the Authority as allowed by statute and the replacement with current service costs and past service costs
- **For Financing and investment income and expenditure** - the net interest on the defined benefit liability is charged to the CIES

**c) Other Differences** - other differences debited / credited to the CIES and amounts payable / receivable to be recognised under statute i.e. accumulated absences.

**Notes Supporting the Comprehensive Income and Expenditure Statement**

**Note 10: Expenditure and Income Analysed by Nature**

2020/21 £000	Expenditure	2021/22 £000
2,885	Employee Benefits Expenses	2,913
1,284	Other Service Expenses	2,365
124	Depreciation, Amortisation & Impairment	131
225	Interest Payments	276
<b>4,518</b>	<b>Total Expenditure</b>	<b>5,685</b>
	<b>Income</b>	
(1,255)	Grants, Fees, Charges and other Service Income	(1,973)
(3,211)	Government Grants & Contributions	(3,211)
(17)	Interest & Investment Income	(9)
<b>(4,483)</b>	<b>Total Income</b>	<b>(5,193)</b>
<b>35</b>	<b>(Surplus)/ Deficit on the provision of service</b>	<b>492</b>

## Note 11: Segmental Income

### 2021/22

	<b>Grants &amp; Contributions</b>	<b>Fees &amp; Charges</b>	<b>Sales Income</b>	<b>Other</b>	<b>Total</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>
Support to Land Managers	(620)	(33)	-	(5)	<b>(658)</b>
Support to the Community	(435)	(118)	-	-	<b>(553)</b>
Support to National Park Users	(112)	(207)	(107)	(30)	<b>(456)</b>
Support Services	(12)	(5)	(10)	(259)	<b>(286)</b>
Corporate Management	-	-	-	-	-
Partnership Fund	-	(20)	-	-	<b>(20)</b>
<b>Total Income</b>	<b>(1,179)</b>	<b>(383)</b>	<b>(117)</b>	<b>(294)</b>	<b>(1,973)</b>

### 2020/21

	<b>Grants &amp; Contributions</b>	<b>Fees &amp; Charges</b>	<b>Sales Income</b>	<b>Other</b>	<b>Total</b>
	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>	<b>£000</b>
Support to Land Managers	(413)	(10)	-	(5)	<b>(428)</b>
Support to the Community	(131)	(93)	-	-	<b>(224)</b>
Support to National Park Users	(164)	(87)	(51)	(30)	<b>(332)</b>
Support Services	(114)	(1)	-	(156)	<b>(271)</b>
Corporate Management	-	-	-	-	-
Partnership Fund	-	-	-	-	-
<b>Total Income</b>	<b>(822)</b>	<b>(191)</b>	<b>(51)</b>	<b>(191)</b>	<b>(1,255)</b>

## Note 12: Other operating expenditure

<b>2020/21</b>		<b>2021/22</b>
<b>£000</b>		<b>£000</b>
(20)	(Gains)/Losses on the disposal of non-current assets	-
8	IAS19 Administration expense	7
<b>(12)</b>	<b>Total</b>	<b>7</b>

## Note 13: Financing and Investment Income and Expenditure

<b>2020/21</b>		<b>2021/22</b>
<b>£000</b>		<b>£000</b>
225	Net interest on the net defined pensions liability	276
(17)	Interest receivable and similar income	(9)
<b>208</b>	<b>Total</b>	<b>267</b>

## Note 14: Taxation and non-specific grant incomes

<b>2020/21</b>		<b>2021/22</b>
<b>£000</b>		<b>£000</b>
(3,211)	Non-ring-fenced government grants	(3,211)
<b>(3,211)</b>	<b>Total</b>	<b>(3,211)</b>

## Note 15: Members Allowances

The Authority paid the following amounts to members of the Authority during the year:

<b>2020/21</b>		<b>2021/22</b>
<b>£000</b>		<b>£000</b>
16	Special Responsibility Allowance	16
61	Basic Allowance	62
1	Allowance for mileage	2
<b>78</b>	<b>TOTAL</b>	<b>80</b>

## Note 16: Officers' Remuneration

The Authority is required to name all officers that earn over £150,000 per annum for all or part of a year (there are none); and to list all officers who earn between £50,000 and £150,000 for all or part of a year, and who also fit the following criteria:

- They report directly to the Chief Executive, or;
- They are part of the Authority's Senior Management Team, or;
- They hold posts required by statute (the Chief Finance Officer and the Monitoring Officer)

	Salary, Fees and Allowance  £000	Expense Allowance  £000	Total Remuneration (excl. pension contribution)  £000	Pension Contribution  £000	Total Remuneration including pension contribution £000
<b>Chief Executive –</b> 2021/22 - 2020/21 -	88 88	- -	88 88	16 16	<b>104</b> <b>104</b>
<b>Head of Finance and Operations</b> 2021/22 - 2020/21 – not applicable, below £50,000	52 -	- -	52 -	10 -	<b>62</b> -
<b>Head of Strategy &amp; Performance</b> 2021/22 - 2020/21 – not applicable, below £50,000	52 -	- -	52 -	10 -	<b>62</b> -
<b>Head of Planning &amp; Sustainable Development</b> 2021/22 - 2020/21 – not applicable, below £50,000	52 -	- -	52 -	10 -	<b>62</b> -
<b>Head of Conservation &amp; Access</b> 2021/22 - 2020/21 – not applicable, below £50,000	52 -	- -	52 -	10 -	<b>62</b> -

The number of employees whose remuneration, excluding employer's pension contributions, was £50,000 or more in bands of £5,000 (including those detailed in the above table) were:

2020/21 Number of employees	Remuneration band	2021/22 Number of employees
1	£50,000 - £54,999	4
-	£55,000 - £59,999	-
-	£60,000 - £64,999	-
-	£65,000 - £69,999	-
-	£70,000 - £74,999	-
-	£75,000 - £79,999	-
-	£80,000 - £84,999	-
1	£85,000 - £89,999	1

## Note 17: Termination Benefits

The number of exit packages with total cost per band and total cost of the compulsory and other redundancies are set out in the table below:

Exit package cost band (including special payments)	Number of compulsory redundancies		Number of other departures agreed		Total number of exit packages by cost band		Total cost of exit packages in each band £000	
	2020/21	2021/22	2020/21	2021/22	2020/21	2021/22	2020/21	2021/22
£0 - £20,000	2	-	-	-	2	-	10	-
£20,001 - £40,000	-	-	1	-	1	-	24	-
£40,001 - £60,000	-	-	-	-	-	-	-	-
£60,001 - £80,000	-	-	1	-	1	-	70	-
£80,001 - £100,000	-	-	-	-	-	-	-	-
<b>Total</b>	<b>2</b>	<b>-</b>	<b>2</b>	<b>-</b>	<b>4</b>	<b>-</b>	<b>104</b>	<b>-</b>

#### Note 18: External Audit Costs

The Authority has incurred the following costs in relation to the audit of the Statement of Accounts, certification of grant claims and statutory inspections and to non-audit services provided by the Authority's external auditors:

2020/21 £000		2021/22 £000
9	Fees payable to Grant Thornton with regard to external audit services carried out by the appointed auditor.	9
*7	Audit Fee variation (*Proposed)	*9
<b>16</b>	<b>Total</b>	<b>18</b>

#### Note 19: Grant Income

The Authority credited the following grants, contributions and donations to the Comprehensive Income and Expenditure Statement in 2021/22:

	2020/21 £000	2021/22 £000
<b>Credited to Taxation and Non Specific Grant Income</b>		
National Park Grant – DEFRA	3,211	3,211
<b>Total</b>	<b>3,211</b>	<b>3,211</b>
<b>Credited to Services</b>		
Tests and Trials – DEFRA	72	-
Farming in Protected Landscapes - DEFRA	-	281
BIO Support (Planning Policy) - DEFRA	-	10
Astro Tourism – SWAT	20	-
Tree Planting Grant - SWAT	-	5
Covid Support/ Rate reliefs – SWAT & NDDC	136	45
Walks Project – SWAT	11	11
Visit Exmoor Grant – Visit Britain	14	-
Generation Green – Access Unlimited Coalition	-	51
Rural Crime Grant – Avon & Somerset Police	-	3
Exmoor Tree Nursery – Devon Environmental Foundation	15	-
Woodlands – Plantlife	7	16
Woodside Bridge – Lyn Community Development Trust	22	-
Health & Wellbeing – Somerset County Council	18	-
Cow Castle – Honeymead Arts Trust	2	-
Coast Path & Landscape Monitoring – Natural England	26	16
Woodland Visualisation Project – Natural England	5	-
Sowing the Seeds – Natural England	-	5
English Coast Path – Natural England	-	5
Grey Squirrel Control – Forestry Commission	3	-
Bye Wood - Forestry Commission	-	53
Bye Wood – Exmoor Trust	-	5

Basic Payment & Higher Level Stewardship Scheme – RPA	106	79
Countryside Stewardship – RPA	48	67
Rhododendron Control - RPA	4	-
<b>Total</b>	<b>509</b>	<b>657</b>

## **Notes to Support the Movement in Reserves Statement**

### **Note 20: Adjustments between accounting basis and funding basis under regulations**

This note details the adjustments that are made to the total comprehensive income and expenditure recognised by the Authority in the year in accordance with proper accounting practice to the resources that are specified by statutory provisions as being available to the Authority to meet future capital and revenue expenditure.

2021/22	General Fund Balance £000	Capital Receipts Reserve £000	Capital Grants Unapplied £000	Movement in Unusable Reserves £000
<b>Adjustments to Revenue Resources:</b>				
Amounts by which income & expenditure included in the CIES are different from revenue for the year calculated in accordance with statutory requirements:				
Pension Costs	821	-	-	(821)
Holiday pay	(24)	-	-	24
Reversal of entries included in the Surplus or Deficit on the Provision of Services in relation to capital expenditure (these items are charged to the Capital Adjustment Account)	(20)	-	52	(32)
<b>Total Adjustments to Revenue Resources</b>	<b>777</b>	<b>-</b>	<b>52</b>	<b>(829)</b>
<b>Adjustments between Revenue and Capital Resources:</b>				
Capital expenditure financed from revenue balances (transfer to the Capital Adjustment Account)	(75)	-	-	75
Transfer of sales proceeds credited as part of the gain/loss on disposal	-	-	-	-
<b>Total Adjustments between Revenue and Capital resources</b>	<b>(75)</b>	<b>-</b>	<b>-</b>	<b>75</b>
<b>Adjustments to Capital Resources:</b>				
Application of Capital Grants to finance Capital Expenditure	-	-	(52)	52
Application of Capital Receipts to finance Capital Expenditure	-	(100)	-	100
<b>Total Adjustments to Capital Resources</b>	<b>-</b>	<b>(100)</b>	<b>(52)</b>	<b>152</b>
<b>Total Adjustments</b>	<b>702</b>	<b>(100)</b>	<b>-</b>	<b>(602)</b>

2020/21	General Fund Balance £000	Capital Receipts Reserve £000	Capital Grants Unapplied £000	Movement in Unusable Reserves £000
<b>Adjustments to Revenue Resources:</b>				
<u>Amounts by which income &amp; expenditure included in the CIES are different from revenue for the year calculated in accordance with statutory requirements:</u>				
Pension Costs	417	-	-	(417)
Holiday pay	29	-	-	(29)
Reversal of entries included in the Surplus or Deficit on the Provision of Services in relation to capital expenditure (these items are charged to the Capital Adjustment Account)	(197)	-	22	175
<b>Total Adjustments to Revenue Resources</b>	<b>249</b>	<b>-</b>	<b>22</b>	<b>(271)</b>
<b>Adjustments between Revenue and Capital Resources:</b>				
Capital expenditure financed from revenue balances (transfer to the Capital Adjustment Account)	(175)	-	-	175
Transfer of sales proceeds credited as part of the gain/loss on disposal	(100)	100	-	-
<b>Total Adjustments between Revenue and Capital resources</b>	<b>(275)</b>	<b>100</b>	<b>-</b>	<b>175</b>
<b>Adjustments to Capital Resources:</b>				
Application of Capital Grants to finance Capital Expenditure	-	-	(22)	22
Application of capital Receipts to finance Capital Expenditure	-	-	-	-
<b>Total Adjustments to Capital Resources</b>	<b>-</b>	<b>-</b>	<b>(22)</b>	<b>22</b>
<b>Total Adjustments</b>	<b>(26)</b>	<b>100</b>	<b>-</b>	<b>(74)</b>

## Note 21: Transfers to/ from Earmarked Reserves

The Authority's reserve balances are continually reviewed to determine the appropriate level and use. We regularly establish new reserves, assess the appropriate level of existing reserves or cancel reserves that have met their objective. Our reserves are made up as follows:

- General Reserve (unallocated) – this is the minimum level required to maintain working balances (in accordance with CIPFA guidance).
- Partnership Fund Reserves (allocated) – these sums are set aside to meet one-off priorities that assist in the delivery of the Partnership Plan.
- Earmarked Reserves (allocated) – these consist of ring-fenced grants and contributions received from third parties, sums set aside for capital schemes and commitments against future obligations.
- Capital Grants – these include funds received from external organisations towards investment in assets.
- Capital Receipts Reserve – holds the proceeds from the disposal of land or other assets which are restricted by statute from being used other than to fund new capital expenditure or to be set aside to finance historical capital expenditure

It can therefore be seen that the majority of our Reserve Balances are “allocated”. The following table sets out the amounts set aside from the General Fund balance in earmarked reserves to provide financing for future expenditure plans and the amounts posted back from earmarked reserves to meet General Fund expenditure in year.

	Balance at 31 March 2020 £000	Transfers between Reserves £000	Transfers In 2020/21 £000	Transfers Out 2020/21 £000	Increase/ Decrease (-) in useable Reserves 2020/21 £000	Balance at 31 March 2021 £000	Transfers between Reserves £000	Transfers In 2021/22 £000	Transfers Out 2021/22 £000	Increase/ Decrease in useable Reserves 2021/22 £000	Balance at 31 March 2022 £000
<b>Earmarked Reserves</b>	<b>2,084</b>	185	436	(483)	<b>138</b>	<b>2,222</b>	23	857	(650)	<b>230</b>	<b>2,452</b>
<b>Partnership Fund Reserves</b>	<b>475</b>	(56)	64	(182)	<b>(174)</b>	<b>301</b>	(34)	99	(101)	<b>(36)</b>	<b>265</b>
<b>General Fund Balance</b>	<b>325</b>	(129)	104		<b>(25)</b>	<b>300</b>	11	5	-	<b>16</b>	<b>316</b>
<b>Capital Grants Unapplied</b>	-	-	22	(22)	-	-	-	52	(52)	-	-
<b>Capital Receipts Reserve</b>	-	-	100	-	<b>100</b>	<b>100</b>	-		(100)	<b>(100)</b>	-
<b>Total Useable Reserves</b>	<b>2,884</b>	-	<b>726</b>	<b>(687)</b>	<b>39</b>	<b>2,923</b>	-	<b>1,013</b>	<b>(903)</b>	<b>110</b>	<b>3,033</b>

## Notes to Support the Balance Sheet

### Note 22: Property, Plant and Equipment

#### Movements on Balances

	Land & Buildings £000	Vehicles, Plant & Equipment £000	Infrastructure £000	Assets Under Construction £000	Total £000
<b>Cost or Valuation 1 April 2021</b>	<b>19,094</b>	<b>224</b>	<b>70</b>	<b>0</b>	<b>19,388</b>
Additions	227	-	-	-	227
De-recognition – Disposals	-	-	-	-	-
Reclassifications (to)/ from held for sale	-	-	-	-	-
Revaluation Increase/ decrease (-):					
- to Revaluation Reserve	162	-	-	-	162
- to Surplus/ Deficit on the provision of service	4	-	-	-	4
Other movement in cost of valuation	-	-	-	-	-
<b>Cost or Valuation 31 March 2022</b>	<b>19,487</b>	<b>224</b>	<b>70</b>	<b>0</b>	<b>19,781</b>
<b>Accumulated depreciation 1 April 2021</b>	<b>-</b>	<b>(104)</b>	<b>(3)</b>	<b>-</b>	<b>(107)</b>
Depreciation Charge	(94)	(33)	(3)	-	(130)
Derecognition - Disposals	-	-	-	-	-
Depreciation written out to the Revaluation Reserve	25	-	-	-	25
Depreciation written out to the Surplus/ Deficit on the provision of services	69	-	-	-	69
<b>Total Depreciation at 31 March 2022</b>	<b>-</b>	<b>(137)</b>	<b>(6)</b>	<b>-</b>	<b>(143)</b>
<b>Net Book Value at 1 April 2021</b>	<b>19,094</b>	<b>120</b>	<b>67</b>	<b>-</b>	<b>19,281</b>
<b>Net Book Value at 31 March 2022</b>	<b>19,477</b>	<b>87</b>	<b>64</b>	<b>-</b>	<b>19,638</b>



	Land & Buildings £000	Vehicles, Plant & Equipment £000	Infrastructure £000	Assets Under Construction £000	Total £000
<b>Cost or Valuation 1 April 2020</b>	<b>18,368</b>	<b>242</b>	<b>-</b>	<b>297</b>	<b>18,907</b>
Additions	61	66	70	-	197
De-recognition – Disposals	-	(84)	-	-	(84)
Reclassifications (to)/ from held for sale	-	-	-	-	-
Revaluation Increase/ decrease (-):					
- to Revaluation Reserve	71	-	-	-	71
- to Surplus/ Deficit on the provision of service	530	-	-	(233)	297
Other movement in cost of valuation	64	-	-	(64)	-
<b>Cost or Valuation 31 March 2021</b>	<b>19,094</b>	<b>224</b>	<b>70</b>	<b>0</b>	<b>19,388</b>
<b>Accumulated depreciation 1 April 2020</b>	<b>-</b>	<b>(141)</b>	<b>-</b>	<b>-</b>	<b>(141)</b>
Depreciation Charge	(74)	(47)	(3)	-	(124)
Derecognition - Disposals	-	84	-	-	84
Depreciation written out to the Revaluation Reserve	22	-	-	-	22
Depreciation written out to the Surplus/ Deficit on the provision of services	52	-	-	-	52
<b>Total Depreciation at 31 March 2021</b>	<b>-</b>	<b>(104)</b>	<b>(3)</b>	<b>-</b>	<b>(107)</b>
<b>Net Book Value at 1 April 2021</b>	<b>18,368</b>	<b>101</b>		<b>297</b>	<b>18,766</b>
<b>Net Book Value at 31 March 2022</b>	<b>19,094</b>	<b>120</b>	<b>67</b>	<b>-</b>	<b>19,281</b>

### Depreciation

The following useful lives and depreciation rates have been used in the calculation of depreciation:

- Land and Buildings: 40-80 years
- Vehicles, Plant, Furniture and Equipment: 5-10 years
- Infrastructure: 25 years

## Revaluations

The Authority carries out a valuation programme which ensures all Property, Plant and Equipment is measured at fair value in accordance with IAS16 and revalued at least every five years. We are currently revaluing assets every year to ensure that the values stated are materially correct. The valuation date is the 31<sup>st</sup> March. For 2021/22 the valuation was carried out by Mark Reynolds MRICS and Registered Valuer while employed by the NPS Group Limited in accordance with the methodologies and bases for estimation set out in the professional standards of the Royal Institution of Chartered Surveyors – the RICS Valuation – Global Standards January 2020, Chartered Institute of Public Finance and Accountancy (CIPFA) accounting code and the International Financial Reporting Standards (IFRS) and the RICS Code of Measuring Practice.

There were no capital commitments at the 31 March 2022.

The Authority within the 2019/20 and 2020/21 accounts declared a ‘material valuation uncertainty’ because of the possible impact of Covid on Land and Property valuations. This year no such declaration is necessary.

### Note 23: Heritage Assets

	<b>Heritage Assets £000</b>
<b>Cost or Valuation 1 April 2021</b>	<b>92</b>
Additions	-
Revaluation Increase/ decrease (-):	
- to Revaluation Reserve	-
- to Surplus/ Deficit on the provision of service	-
<b>Cost or Valuation 31 March 2022</b>	<b>92</b>
<b>Cost or Valuation 1 April 2020</b>	<b>81</b>
Additions	-
Revaluation Increase/ decrease (-):	
- to Revaluation Reserve	3
- to Surplus/ Deficit on the provision of service	8
<b>Cost or Valuation 31 March 2021</b>	<b>92</b>

### Note 24: Assets Held for Sale

<b>31 March 2021 £000</b>		<b>31 March 2022 £000</b>
<b>80</b>	<b>Balance outstanding at the start of the year</b>	-
-	Assets newly classified as held for sale	-
80	Assets sold	-
-	<b>Balance outstanding at the end of the year</b>	-

### Note 25: Financial Instruments

Financial instruments are defined as contracts that give rise to a financial asset of one entity and a financial liability or equity instrument of another entity.

## Financial Assets: Amortised Cost

31 March 2021 £000		31 March 2022 £000
2,900	Comingled Fund	2,900
-	Cash in hand and at bank	-
183	Contractual Debtors	448
<b>3,083</b>	<b>Total</b>	<b>3,348</b>

## Financial Liabilities: Amortised Cost

31 March 2021 £000		31 March 2022 £000
(45)	Bank Overdraft	(75)
(242)	Contractual Creditors	(336)
<b>(287)</b>	<b>Total</b>	<b>(411)</b>

## Interest and Investment Income:

The (gains) and losses recognised in the Comprehensive Income and Expenditure Statement in relation to financial instruments is as follows:

31 March 2021 £000		31 March 2022 £000
(17)	Interest Income	(9)
<b>(17)</b>	<b>Total</b>	<b>(9)</b>

Financial assets and liabilities are carried in the Balance Sheet at amortised cost. Their fair value has been assessed by calculating the present value of the cash flows that will take place over the remaining life of the instrument using the following assumptions:

- The fair value of trade and other receivables and payables is taken to be the invoiced or billed amount
- The fair value of cash deposits is taken to be the cash balance as at 31 March

## Nature and Extent of Risks Arising from Financial Instruments

The Authority's activities expose it to a variety of financial risks:

- Credit risk – the possibility that other parties might fail to pay amounts due
- Liquidity risk – the possibility that the Authority may not have funds available to meet its commitments to make payments
- Market risk – the possibility that financial loss might arise for the Authority as a result of changes in such measures as interest rates and stock market movements

The Authority's overall risk management programme focuses on the unpredictability of financial markets and seeks to minimise potential adverse effects on the resources available to fund services. Risk management is carried out by the Chief Finance Officer, under policies approved by the Authority. The Authority has adopted the CIPFA Code of Practice for Treasury Management and as part of this approves an annual Treasury Management Strategy and Practices which sets out the policies on borrowing, investment, credit risk and interest rate exposure.

## Credit Risk and Expected Credit Loss Allowances

Credit risk arises from deposits with banks and financial institutions, as well as credit exposures to the Authority's customers. This risk is minimised through the Authority's Annual Investment Strategy and investment solely within the Somerset County Council Co-mingled Fund.

Amounts arising from expected credit losses would normally be established for investments and debtors based upon estimates of the losses that might be incurred if those owing money to the Authority fail to pay it back. As our primary counter party is a public body and as statute prevents a local authority from default, we have concluded that the expected credit loss is not material and therefore no allowance has been made.

The Authority's standard terms and conditions for payment of invoices (trade receivables) are 28 days from invoice date. Low risk, no history of default and with signed agreements in place with third parties, we have concluded that the expected credit loss is not material therefore no allowance has been made.

### Liquidity Risk

The Authority has a comprehensive cash flow management system that seeks to ensure that cash is available when needed. Surplus cash is invested using an overnight clearing system operated by Somerset County Council.

All trade and other payables are due to be paid in less than one year. The Authority currently has no borrowings and so there is no significant current or future risk that it will be unable to raise finance to meet its commitments under financial instruments.

### Market Risk

The Authority is currently debt free and does not have any investments in equity shares or financial assets or liabilities denominated in foreign currencies. Market Risk is therefore limited to Interest Rate Risk on our cash investments.

- Interest Risk

In terms of short-term cash investments, the variable rate of interest earned on surplus funds moves during the year and any assumptions in annual budgets are made cautiously based on current market and treasury forecasts. A 1% movement in interest rates would result in approximately £30,000 more or less than budget if investments were held for a year.

### Note 26: Debtors

31 March 2021 £000		31 March 2022 £000
84	Central government bodies	138
52	Other local authorities	112
47	Public corporations and trading funds	122
31	Other entities and individuals	113
<b>214</b>	<b>Total</b>	<b>485</b>

### Note 27: Cash and Cash Equivalents

The balance of Cash and Cash Equivalents is made up of the following elements:

31 March 2021 £000		31 March 2022 £000
(45)	Bank Current Accounts	(75)
2,900	Co-mingled fund held by Somerset County Council	2,900
<b>2,855</b>	<b>Total Cash and Cash Equivalents</b>	<b>2,825</b>

### Note 28: Creditors

31 March 2021 £000		31 March 2022 £000
(116)	Other local authorities	(58)
(46)	Public corporations and trading funds	(55)
(126)	Other entities and individuals	(279)
<b>(288)</b>	<b>Total</b>	<b>(392)</b>

## Note 29: Usable Reserves

Movements in the Authority's usable reserves are detailed in the Movements in Reserves Statement and in notes 20 and 21.

## Note 30: Capital Grants

31 March 2021 £000		31 March 2022 £000
-	<b>Balance at 1 April</b>	-
(22)	Capital grants received	(52)
22	Capital grants used to finance spend	52
-	<b>Balance at 31 March</b>	-

## Note 31: Unusable Reserves

31 March 2021 £000		31 March 2022 £000
(10,861)	Revaluation Reserve	(11,024)
(8,511)	Capital Adjustment Account	(8,705)
14,073	Pensions Reserve	12,242
82	Accumulated Absences Account	57
<b>(5,217)</b>	<b>Total Unusable Reserves</b>	<b>(7,430)</b>

### Revaluation Reserve

The Revaluation Reserve contains the gains made by the Authority arising from increases in the value of its Property, Plant and Equipment. The balance is reduced when assets with accumulated gains are:

- Revalued downwards or impaired and the gains are lost
- Used in the provision of services and the gains are consumed through depreciation, or
- Disposed of and the gains are realised.

The Reserve contains only revaluation gains accumulated since 1 April 2007, the date that the Reserve was created. Accumulated gains arising before that date are consolidated into the balance on the Capital Adjustment Account.

2020/21 £000		2021/22 £000
<b>(10,813)</b>	<b>Balance at 1 April</b>	<b>(10,861)</b>
(311)	Upward revaluation of assets	(286)
238	Downward revaluation of assets and impairment losses not charged to the Surplus/Deficit on the provision of Services	123
<b>(73)</b>	<b>Surplus or deficit on revaluation of non-current assets not posted to the Surplus or Deficit on the Provision of Services</b>	<b>(153)</b>
-	Difference between fair value depreciation and historical cost depreciation	-
25	Accumulated gains on assets sold or scrapped	-
<b>25</b>	<b>Amount written off to the Capital Adjustment Account</b>	<b>-</b>
<b>(10,861)</b>	<b>Balance at 31 March</b>	<b>(11,024)</b>

## Capital Adjustment Account

The Capital Adjustment Account absorbs the timing differences arising from the different arrangements for accounting for the consumption of non-current assets and for financing the acquisition, construction or enhancement of those assets under statutory provisions. The account is debited with the cost of acquisition, construction or enhancement as depreciation, impairment losses and amortisations are charged to the Comprehensive Income and Expenditure Statement (with reconciling postings from the Revaluation Reserve to convert fair value figures to a historical cost basis). The Account is credited with the amounts set aside by the Authority as finance for the costs of acquisition, construction and enhancement.

The Account also contains revaluation gains accumulated on Property, Plant and Equipment before 1 April 2007, the date that the Revaluation Reserve was created to hold such gains.

Note 22 provides details of the source of all the transactions posted to the Account, apart from those involving the Revaluation Reserve.

2020/21 £000		2021/22 £000
(8,113)	<b>Balance at 1 April</b>	(8,511)
	Reversal of items relating to capital expenditure debited or credited to the Comprehensive Income and Expenditure Statement:	
50	Charges for depreciation and impairment of non-current assets	37
(306)	Revaluation losses on Property, Plant and Equipment	(4)
-	Revenue expenditure funded from capital under statute	-
55	Amounts of non-current assets written off on disposal or sale as part of the gain/loss on disposal to the Comprehensive Income and Expenditure Statement	-
(8,314)		(8,478)
-	Adjusting amounts written out of the Revaluation Reserve	-
(8,314)	<b>Net written out amount of the cost of non-current assets consumed in the year</b>	(8,478)
<b>Capital financing applied in the year:</b>		
(22)	Use of Capital Grants to finance capital expenditure	(52)
-	Use of Capital Receipts to finance capital expenditure	(100)
(175)	Capital Expenditure charged against the General Fund	(75)
(8,511)	<b>Balance at 31 March</b>	(8,705)

## Pensions Reserve

The Pensions Reserve absorbs the timing differences arising from the different arrangements for accounting for post-employment benefits and for funding benefits in accordance with statutory provisions. The Authority accounts for post-employment benefits in the Comprehensive Income and Expenditure Statement as the benefits are earned by employees accruing years of service, updating the liabilities recognised to reflect inflation, changing assumptions and investment returns on any resources set aside to meet the costs. However, statutory arrangements require benefits earned to be financed as the Authority makes employer's contributions to pension funds or eventually pays any pensions for which it is directly responsible. The debit balance on the Pensions Reserve therefore shows a substantial shortfall in the benefits earned by past and current employees and the resources the Authority has set aside to meet them. The statutory arrangements will ensure that funding will have been set aside by the time the benefits come to be paid.

2020/21 £000		2021/22 £000
<b>9,838</b>	<b>Balance at 1 April</b>	<b>14,073</b>
3,818	Remeasurement of net defined liability	(2,652)
943	Reversal of items relating to retirement benefits debited or credited to the Surplus or Deficit on the Provision of Services in the CI & E	1,427
(526)	Employer's pensions contributions and direct payments to pensioners payable in the year	(606)
<b>14,073</b>	<b>Balance at 31 March</b>	<b>12,242</b>

#### Accumulated Absences Account

The Accumulated Absences Account absorbs the differences that would otherwise arise on the General Fund Balance from accruing for compensated absences earned but not taken in the year, e.g. annual leave entitlement carried forward at 31 March. Statutory arrangements require that the impact on the General Fund Balance is neutralised by transfers to or from the Account.

2020/21 £000		2021/22 £000
<b>53</b>	<b>Balance at 1 April</b>	<b>82</b>
(53)	Settlement or cancellation of accrual made at the end of the preceding year	(82)
82	Amounts accrued at the end of the current year	57
29	Amount by which officer remuneration charged to the Comprehensive Income and Expenditure Statement on an accruals basis is different from remuneration chargeable in the year in accordance with statutory requirements.	(24)
<b>82</b>	<b>Balance at 31 March</b>	<b>57</b>

#### Note 32: Capital Expenditure and Capital Financing

The total amount of capital expenditure incurred in the year is shown in the table below, together with the resources that have been used to finance it. Where capital expenditure is to be financed in future years by charges to revenue as assets are used by the Authority, the expenditure results in an increase in the Capital Financing Requirement (CFR), a measure of the capital expenditure incurred historically by the Authority that has yet to be financed. The Authority remains Debt Free throughout the periods contained in this Statement of Accounts and therefore does not have incurred expenditure yet to be financed.

	2020/21 £000	2021/22 £000
<i>Capital Investment</i>		
<b>Property, Plant &amp; Equipment</b>	<b>197</b>	<b>227</b>
Revenue Expenditure Funded from Capital under Statute	-	-
<i>Sources of finance</i>		
Capital Receipts	-	100
Government Grants and other contributions	22	52
Sums set aside from revenue	175	75

### **Note 33: Impairment Losses**

The Authority did not recognise any impairment losses during 2021/22 (2020/21 £0k). Impairment losses are recognised as part of the valuation of the authority's non-current assets.

### **Note 34: Defined Benefit Pension Schemes**

#### **Participation in Pension Schemes:**

As part of the terms of employment of its officers, the Authority makes contributions towards the cost of post-employment benefits. Although these benefits will not actually be payable until employees retire, the Authority has a commitment to make the payments that needs to be disclosed at the time that employees earn their future entitlement. The Authority participates in the Local Government Pension Scheme that is administered locally by Somerset County Council. This is a funded defined benefit final salary scheme, meaning that the Authority and employees pay contributions into a fund, calculated at a level intended to balance the pensions liabilities with investment assets.

The Pension Fund Committee, at Somerset County Council, oversees the management of the Fund whilst the day-to-day fund administration is undertaken by a team within the administering authority. Where appropriate some functions are delegated to the Fund's professional advisers. As administering authority to the Fund, Somerset County Council, after consultation with the Fund Actuary and other relevant parties, is responsible for the preparation and maintenance of the Funding Strategy Statement and the Statement of Investment Principles. These should be amended when appropriate based on the Fund's performance and funding.

Contributions are set every three years as a result of the actuarial valuation of the Fund required by the Regulations. The latest actuarial valuation of the Fund was carried out as at 31 March 2019 and contributions have been set for the period from 1 April 2020 to 31 March 2023. There are no minimum funding requirements in the LGPS but the contributions are generally set to target a funding level of 100% using the actuarial valuation assumptions.

In general, participating in a defined benefit pension scheme means that the Employer is exposed to a number of risks:

- Investment risk. The Fund holds investment in asset classes, such as equities, which have volatile market values and while these assets are expected to provide real returns over the long-term, the short-term volatility can cause additional funding to be required if a deficit emerges;
- Interest rate risk. The Fund's liabilities are assessed using market yields on high quality corporate bonds to discount future liability cash flows. As the Fund holds assets such as equities the value of the assets and liabilities may not move in the same way;
- Inflation risk. All of the benefits under the Fund are linked to inflation and so deficits may emerge to the extent that the assets are not linked to inflation; and
- Longevity risk. In the event that the members live longer than assumed a deficit will emerge in the Fund. There are also other demographic risks

In addition, as many unrelated employers participate in the Somerset County Council Pension Fund, there is an orphan liability risk where employers leave the Fund but with insufficient assets to cover their pension obligations so that the difference may fall on the remaining employers. All of the risks above may also benefit the employer e.g. higher than expected investment returns or employers leaving the Fund with excess assets which eventually get inherited by the remaining employers. The Authority's Pension Fund liability does not represent an immediate call on reserves; it is a snap-shot valuation in time, based on assumptions. The true value of the deficit is assessed on a triennial basis with contribution rates set to recover the balance over the longer-term.



The Court of Appeal judgment on the McCloud and Sargeant cases, relate to age discrimination against the age-based transitional provisions put into place when the new judicial pension arrangements were introduced in 2015. Although the Tribunal ruled against the Government and the Supreme Court denied their appeal, the outcome of these matters is still to be agreed so the exact impact they will have on LGPS benefits is unknown. Remedial regulations are expected in 2022 and the uncertainty over the benefit changes proposed for the LGPS will remain until these have been finalised. The McCloud remedy may impact the value of the liabilities in respect of accrued benefits and therefore an allowance may need to be included.

On 23 March 2021, the Government published the outcome to its Guaranteed Minimum Pension Indexation consultation, concluding that all public service pension schemes, including the LGPS, will be directed to provide full indexation to members with a GMP reaching State Pension Age (SPA) beyond 5 April 2021. This is a permanent extension of the existing 'interim solution' that has applied to members with a GMP reaching SPA on or after 6 April 2016.

The Actuary's valuation assumption for GMP is that the Fund will pay limited increases for members that have reached SPA by 6 April 2016, with the Government providing the remainder of the inflationary increase. For members that reach SPA after this date, the Actuary has assumed that the Fund will be required to pay the entire inflationary increase. Therefore, the Actuary's assumption is consistent with the consultation outcome and the Actuary does not believe that it is necessary to make any adjustments to the value placed on the liabilities as a result of the above outcome.

### **Transactions Relating to Post-Employment Benefits**

We recognise the cost of retirement benefits in the reported cost of services when they are earned by employees, rather than when the benefits are eventually paid out as pensions. However, the charge we are required to make is based on the cash payable in the year, so the real cost of post-employment/retirement benefits is reversed out of the General Fund via the Movements in Reserves Statement. The following transactions have been made in the Comprehensive Income and Expenditure Statement and the General Fund Balance through the Movement in Reserves Statement during the year:

	2020/21 £000	2021/22 £000
<i>Service Cost</i>		
• Current Service Cost	691	1,112
• Past Service Costs (including curtailments)	19	32
<b>Total Service Cost</b>	<b>710</b>	<b>1,144</b>
<i>Financing and Investment Income and Expenditure</i>		
• Net interest on the defined liability (asset)	225	276
• Administration expenses	8	7
<b>Total Net Interest</b>	<b>233</b>	<b>283</b>
<b>Total Post Employment Benefit Charged to the Surplus or Deficit on the Provision of Services</b>	<b>943</b>	<b>1,427</b>
<i>Remeasurement of the Net Defined Liability Comprising:</i>		
• Return on plan assets excluding amounts included in net interest	(2,965)	(927)
• Experience (gain)/loss on defined benefit obligation	(268)	59
• Actuarial losses arising from changes in demographic assumptions	(233)	-
• Actuarial losses arising from changes in financial assumptions	7,284	(1,784)
• Other actuarial gains & losses on assets	-	-
<b>Total re-measurements recognised in Other Comprehensive Income</b>	<b>3,818</b>	<b>(2,652)</b>
<b>Total Post Employment Benefits Charged to the Comprehensive Income and Expenditure Statement</b>	<b>4,761</b>	<b>(1,225)</b>
<b>Movement in Reserves Statement</b>		
• Reversal of net charges made to the Surplus or Deficit for the Provision of Services for post employment benefits in accordance with the Code	<b>(943)</b>	<b>(1,427)</b>
<b>Actual amount charged against the General Fund Balance for pensions in the year:</b>		
• Employer's contributions payable to scheme	<b>526</b>	<b>606</b>

**Pension Assets and Liabilities in Relation to Post-Employment Benefits Recognised in the Balance Sheet**

	2020/21 £000	2021/22 £000
Present value of funded obligation	(29,145)	(28,509)
Fair value of employer assets	15,374	16,544
Present value of unfunded obligation	(302)	(277)
<b>Net Liability Arising from Defined Benefit Obligation</b>	<b>(14,073)</b>	<b>(12,242)</b>

**Reconciliation of Present Value of the Scheme Liabilities (Defined Benefit Obligation):**

	<b>2020/21 £000</b>	<b>2021/22 £000</b>
<b>Opening Balance at 1 April</b>	<b>(21,679)</b>	<b>(29,447)</b>
Current service cost	(691)	(1,112)
Interest cost	(507)	(583)
Change in financial assumptions	(7,284)	1,784
Change in demographic assumptions	233	-
Experience loss / (gain) on defined benefit obligation	268	(59)
Estimated benefits paid net of transfers in	339	777
Past service costs, including curtailments	(19)	(32)
Contributions by scheme participants	(131)	(137)
Unfunded pension payments	24	23
<b>Closing Balance at 31 March</b>	<b>(29,447)</b>	<b>(28,786)</b>

**Reconciliation of the Movements in Fair Value of the Scheme (plan) Assets:**

	<b>2020/21 £000</b>	<b>2021/22 £000</b>
<b>Opening Balance at 1 April</b>	<b>11,841</b>	<b>15,374</b>
Interest on assets	282	307
Return on assets less interest	2,965	927
Other actuarial gains/(losses)	-	-
Administration expenses	(8)	(7)
Contributions by employer including unfunded	526	606
Contributions by scheme participants	131	137
Estimated benefits paid plus unfunded net of transfers in	(363)	(800)
<b>Closing Balance at 31 March</b>	<b>15,374</b>	<b>16,544</b>

The liabilities show the underlying commitments that the authority has to pay post-employment (retirement) benefits. The total liability of £12,242k (2020/21 £14,073k) has a substantial impact on the net worth of the authority as recorded in the Balance Sheet, resulting in the overall balance of £10,463k (2020/21 £8,140k). However, arrangements for funding the deficit mean that the financial position of the Authority remains healthy.

**The Local Government Pension Scheme's assets consist of the following categories, by proportion of the total assets held:**

	<b>2020/21</b>		<b>2021/22</b>	
	<b>£000</b>	<b>%</b>	<b>£000</b>	<b>%</b>
Equities	11,117	72%	12,013	72%
Gilts	857	6%	835	5%
Other Bonds	1,447	9%	1,601	10%
Property	1,031	7%	1,329	8%
Cash and cash equivalents	922	6%	766	5%
<b>Total</b>	<b>15,374</b>	<b>100%</b>	<b>16,544</b>	<b>100%</b>

- The deficit on the Local Government Pension Scheme will be made good by increased contributions over the remaining working life of employees (i.e. before payments fall due), as assessed by the scheme actuary
- Finance is only required to be raised to cover discretionary benefits when the pensions are actually paid.

The total contributions expected to be made to the LGPS by the Authority in the year to 31 March 2023 is £530k.

## Basis for Estimating Assets and Liabilities

Liabilities have been assessed on an actuarial basis using the projected unit credit method, an estimate of the pensions that will be payable in future years' dependant on assumptions about mortality rates, salary levels, etc. The LGPS liabilities have been assessed by Barnett and Waddingham, an independent firm of actuaries, estimates for the County Council Fund being based on the latest full valuation as at 31 March 2019. Their estimate of the past service liability is 21 years. This is based on membership data provided as part of the recent valuation.

The principal assumptions used by the actuary have been:

<i>Mortality assumptions</i>	2020/21	2021/22
Retiring today:		
• Men	23.1	23.1
• Women	24.6	24.7
Retiring in 20 years:		
• Men	24.4	24.4
• Women	26.0	26.1
Rate of Inflation (CPI)	2.85%	3.20%
Rate of increase in salaries	3.85%	4.20%
Rate of increase in pensions	2.85%	3.20%
Rate for discounting scheme liabilities	2.00%	2.60%
Take-up of option to convert annual pension into retirement lump sum	50%	50%
Take-up of active members to pay 50% contributions for 50% benefits	10%	10%

The estimation of the defined benefit obligations is sensitive to the actuarial assumptions set out in the table above. The sensitivity analysis below is based on reasonably possible changes to the assumptions occurring at the end of the reporting period and assumes for each change that the assumption analysed changes while all the other assumptions remain constant. The assumptions in longevity, for example, assume that life expectancy increases or decreases for men and women. In practice this is unlikely to occur, and changes in some of the assumptions may be interrelated. The estimations in the sensitivity analysis have followed the accounting policies for the scheme, i.e. on an actuarial basis using the projected unit cost method. The methods and types of assumptions used in preparing the sensitivity analysis below did not change from those used in 2020/21.

<b>Sensitivity Analysis</b>	£000	£000	£000
Adjustment to discount rate	+0.1%	0.0%	-0.1%
Present value of total obligation	28,177	28,786	29,410
Projected service cost	966	999	1,033
Adjustment to long term salary increase	+0.1%	0.0%	-0.1%
Present value of total obligation	28,845	28,786	28,729
Projected service cost	999	999	998
Adjustment to pension increases and deferred revaluation	+0.1%	0.0%	-0.1%
Present value of total obligation	29,347	28,786	28,238
Projected service cost	1,033	999	966
Adjustment to mortality age rating assumption	+1 Year	None	-1 Year
Present value of total obligation	29,995	28,786	27,629
Projected service cost	1,040	999	959

### Note 35: Contingent Liabilities/Assets

Devon County Council agreed as part of its Investing in Devon Programme to grant the sum of £600,000 to support the refurbishment, improvement and adaptation of Lynmouth Pavilion. A contingent liability exists as part of the grant conditions require that in the event of the premises ceasing to be used as a visitor and interpretation centre and learning hub during the period of 20 years from the date of completion of the Project the Grantee shall repay the Grant to the Council but subject to a reduction of five per cent for each complete year which has elapsed following the date of completion of the project. With the completion date being the 8 August 2013 at the balance sheet date a contingent liability exists for £360,000.

The Authority is owed over £130k in relation to a long running listed buildings enforcement case. As at the end of March the Authority was very close to taking possession of a property owned by the debtor that has charges on it equivalent to the amount owed. The debt being paid is therefore contingent upon taking possession of the property and receiving the proceeds from it. Please also see the Events after the Balance Sheet Date Note.

### Notes to Support the Cash Flow Statement

#### Note 36: Cash Flow Statement – Adjustments to surplus or deficit on the Provision of Services for non-cash movements

2020/21 £000		2021/22 £000
(50)	Depreciation and Amortisation	(36)
306	Impairment and Downward Valuations	4
(417)	Actuarial Charges for Retirement Benefits	(821)
(7)	Increase/(Decrease) in Inventory	3
(42)	Increase/(Decrease) in Debtors	270
(34)	(Increase)/Decrease in Creditors & Receipts in Advance	(109)
20	Carrying amount of Non-Current Assets de-recognised	-
<b>(224)</b>		<b>(689)</b>

#### Note 37: Cash Flow Statement – Investing Activities

2020/21 £000		2021/22 £000
197	Purchase of property, plant and equipment, investment property and intangible assets	227
(100)	Proceeds from the sale of property, plant and equipment, investment property and intangible assets	-
<b>97</b>	<b>Net cash flows from investing activities</b>	<b>227</b>

#### Note 38: Cash Flow Statement – Financing Activities

2020/21 £000		2021/22 £000
-	Cash receipts of short and long-term borrowing	-
-	Other receipts from financing activities	-
-	Cash payments for the reduction of the outstanding liabilities relating to finance leases	-
-	Repayment of short and long-term borrowing	-
-	Other payments for financing activities	-
-	<b>Net cash flows from financing activities</b>	<b>-</b>

## ANNUAL GOVERNANCE STATEMENT

### 1. Scope of responsibility

- 1.1 Exmoor National Park Authority is responsible for ensuring that its business is conducted in accordance with the law and proper standards, and that public money is safeguarded and properly accounted for, and used economically, efficiently and effectively. The Authority also has a duty under the Local Government Act 1999 to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.
- 1.2 In discharging this overall responsibility, the Authority is responsible for putting in place proper arrangements for the governance of its affairs, facilitating the effective exercise of its functions, and which includes arrangements for the management of risk.
- 1.3 Exmoor National Park Authority has approved and adopted a code of corporate governance, which is consistent with the principles of the CIPFA/SOLACE Framework *Delivering Good Governance in Local Government*. A copy of the code can be obtained from the Chief Executive, Exmoor House, Dulverton, TA22 9HL. This statement explains how the Authority has complied with the code and also meets the requirements of regulation 6 of the Accounts and Audit Regulations 2015 in relation to the publication of an annual governance statement.

### 2. The purpose of the governance framework

- 2.1 The governance framework comprises the systems and processes, and the culture and values, by which the Authority is directed and controlled and its activities through which it accounts to, engages with and the leads the community. It enables the Authority to monitor the achievement of its strategic objectives and to consider whether those objectives have led to the delivery of appropriate, cost-effective services.
- 2.2 The system of internal control is a significant part of that framework and is designed to manage risk to a reasonable level. It cannot eliminate all risk of failure to achieve policies, aims and objectives and can therefore only provide reasonable and not absolute assurance of effectiveness. The system of internal control is based on an ongoing process designed to identify and prioritise the risks to the achievement of the Authority's policies and aims and objectives, to evaluate the likelihood of those risks being realised and the impact should they be realised, and to manage them efficiently, effectively and economically.
- 2.3 A governance framework has been in place at Exmoor National Park Authority for the year ended 31 March 2021 and up to the date of approval of the Corporate Plan and statement of accounts.

### 3. The Governance Framework

- 3.1 The key elements of the governance framework include:
- A National Park Partnership Plan that contains a vision, priorities and a corporate strategy to meet National Park purposes;
  - The production of a Medium Term Financial Plan taking account of the anticipated level of National Park Grant;
  - The production of a Corporate Plan that includes data on performance and objectives both achieved and planned;

- Committee papers that are linked to National Park Partnership Plan or Corporate Plan objectives and in compliance with equality and human rights legislation;
- Standing orders and financial regulations to regulate the conduct of the Authority's affairs;
- A Scheme of Delegation which sets out the functions and workings of the Authority and the powers delegated to Committees and the Chief Executive;
- Formal codes of conduct which define the standards of personal behaviour of members and staff. The code for Members was initially adopted in 2012 along with the establishment of a Standards Committee comprising 5 Authority members and the appointment of an "Independent Person" under the provisions of the 2011 Localism Act. A further process was the provision of guidance on the registration of interests. This was reviewed and refined in August 2012 with recommendations to Authority for standards arrangements and for the provision of member training on the new standards regime;
- Responsibility for audit matters are retained by the Authority;
- A Solicitor and Monitoring Officer who has a statutory responsibility supported by the Chief Finance Officer and financial regulations to ensure the legality of transactions, activities and arrangements the Authority enters;
- Financial management arrangements of the Authority which conform with the governance requirements of the CIPFA Statement on the role of the Chief Financial Officer in Local Government (2010) ;
- A Complaints procedure and a whistle-blowing policy in place for members of the public, members, staff or contractors;
- An Anti Fraud, Corruption and Bribery Policy;
- An ICT Acceptable Use Policy;
- Risk Management Policy, Registers and Business Continuity and Disaster Recovery systems which are approved, in place and subject to annual regular review;
- Extensive arrangements for partnership working on a range of projects. Partnership working is crucial to the achievement of the priorities set out in the National Park Partnership Plan.
- A staff performance and development review process which identifies training and development needs;
- Training, briefing and induction programmes for members; and
- Wide consultation with interested parties and an Exmoor Consultative and Parish Forum meets to engage with the community and a Local Access Forum considers access and rights of way issues. Numerous diverse organisations are represented on these consultative mechanisms.

#### **4. Review of Effectiveness**

- 4.1 Exmoor National Park Authority has responsibility for conducting at least annually, a review of effectiveness of its governance framework including the system of internal control. The review of effectiveness is informed by the work of the Chief Executive and Heads of Section within the Authority who have responsibility for the development and maintenance of the governance environment, the annual report on internal audit, and by the Annual Governance Report of the external auditors. The annual review of the effectiveness of the governance framework is undertaken by the Standards Committee and the Authority approve this Annual Governance Statement. The Standards Committee now also undertake an annual self-assessment of effectiveness.

4.2 The process that has been applied in maintaining and reviewing the effectiveness of the governance framework is:

- The adoption of an updated Code of Corporate Governance in March 2017 with an annual review by the National Park Authority carried out by the Authority's Solicitor and Monitoring Officer to ensure compliance with the Code and audited by the Chief Finance Officer;
- Adoption of Standing Orders, the scheme of delegation and financial regulations which are periodically reviewed, updated and approved;
- Reports to the Authority on performance management including sustainability and the corporate planning and performance framework;
- Annual reports presented to the Authority in respect of internal audit which is a contracted service, and from the external auditor appointed by the Audit Commission;
- Annual reports presented to the Authority on risk management, performance indicators and treasury management; and
- An internal audit service is contracted from the Devon Audit Partnership and an annual work programme is agreed with the Chief Finance Officer with the internal auditors producing an annual report covering their activities for presentation to the Authority.

## **5. Significant governance issues**

5.1 In general the governance and internal control systems within the Authority are working effectively and have been reviewed by the Solicitor and Monitoring Officer and the Chief Finance Officer and are independently validated by the internal and external auditors. As a consequence of certain Internal Audit findings, the Authority has undertaken a review of Safeguarding policies and practices. These changes were confirmed with Internal Audit during 2021/22.

5.2 During 2022/23 the Authority will be:

- Continuing the communication and implementation of the 2018-23 National Park Partnership Plan;
- Producing guidance on the recently adopted Local Plan;
- Working with Defra to deliver the eight points of the National Parks Plan;
- Monitoring new legislation and changes in policy to ensure that account is taken of the impact on National Parks and National Park communities;
- Responding to the Government on the Landscape Review;
- Continuing to operate within limited resources while increasing revenue from alternative sources;
- Continuing to develop customer service standards and culture; and
- Monitoring the performance of the Corporate Plan.
- Implement the transition back to in person but distanced meetings, and staff gradually returning to Exmoor House.
- Continue to engage and communicate flexibly while making best use of technology.
- Undertake a review of Financial Regulations
- Assist DEFRA with the Governance sections of the Landscapes Review.
- Continue to adapt the Farming in Protected Landscapes panel and model of decision making.
- Understand the implications of the new Somerset Unitary on the Authority's decision making.



- Support Somerset County Council in their implementation of a new financial ledger to ensure that ENPA's requirements are fully met.

5.3 We propose over the coming year to take steps to address the above matters to further enhance our governance arrangements. We are satisfied that these steps will address the need for improvements that were identified in our review of effectiveness and will monitor their implementation and operation as part of our annual review.

**Signed** .....  
Mrs S Bryan, Chief Executive                      R Milton, Chairperson

**Date** .....

## EXMOOR NATIONAL PARK AUTHORITY

5 July 2022

### ANNUAL TREASURY MANAGEMENT REPORT

#### Report of the Head of Finance & Operations

**Purpose of Report:** To report to Members on Treasury Management Performance in 2021/22.

**Recommendation:** The Authority is recommended to NOTE the Treasury Management Outturn for 2021/22.

**Authority priority:** Achieve by providing core services; getting best value from our resources; and improving our performance.

**Legal and equality implications:** Section 65(4) Environment Act 1995 – provides powers to the National Park Authority to “do anything which in the opinion of the Authority, is calculated to facilitate, or is conducive or incidental to-

(a) The accomplishment of the purposes mentioned in s. 65 (1) [National Park purposes]  
(b) The carrying out of any functions conferred on it by virtue of any other enactment.”

The Local Government Act 2003 (LGA 2003)

The CIPFA Treasury Management in the Public Services: Code of Practice and Cross-Sectoral Guidance Notes: Revised 2017 Edition (CIPFA TM Code).

The CIPFA Prudential Code for Capital Finance in Local Authorities: Revised 2017 Edition (CIPFA Prudential Code).

The equality and human rights impact of the recommendations of this report have been assessed as having no adverse impact on any particular group or individual.

**Climate change implications:** It has been assessed that this report does not have an adverse impact on our ability to respond to climate change.

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## 1. Introduction

1.1 The Authority’s Treasury Management activities are defined as follows: -

*“The management of the Authority’s investments and cash flows, its banking and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks.”*

It is acknowledged that effective treasury management provides support to the business and service objectives of the Authority.

1.2 The CIPFA Treasury Management Code requires public sector authorities to determine an annual Treasury Management Strategy and as a minimum, formally report on their treasury activities and arrangements mid-year and after the year-end. These reports enable those tasked with implementing policies and undertaking transactions to demonstrate they have properly fulfilled their

responsibilities and enable those with ultimate responsibility/governance of the treasury management function to scrutinise and assess its effectiveness and compliance with policies and objectives.

- 1.3 During 2021-22, Somerset County Council (SCC) has continued to manage Treasury Management activities under an agreed Service Level Agreement. Investments were made on the basis of aggregating funds in order to maximise the benefits for both bodies (including using SCC's "Comfund"). Accounting arrangements were in place to divide the interest gained (and charged) between the Authorities.
- 1.4 As a result of the second Markets in Financial Instruments Directive (MiFID II), from 3rd January 2018 local authorities were automatically treated as retail clients but could "opt up" to professional client status, providing certain criteria was met. SCC continues to meet the conditions to opt up to professional status and has done so in order to maintain its erstwhile MiFID II status prior to January 2018. As a result, SCC will continue to have access to products including money market funds, pooled funds, treasury bills, bonds, shares and to financial advice.
- 1.5 The Authority delegates responsibility for the implementation and monitoring of its treasury management policies and practices, and the execution of administration of treasury management decisions, to me as Head of Finance & Operations.

## **2. The Economic Background to 2021-22**

- 2.1 All Treasury Management decisions are made in a dynamic environment in which market sentiment, and rates for borrowing and investment are subject to constant change from many different factors. Any volatility in markets makes risk management, forecasting and decision making more difficult. Here follows a brief review of the key issues for 2021-22.
- 2.2 The continuing economic recovery from the coronavirus pandemic, together with the war in Ukraine, higher inflation, and higher interest rates were major issues over the period. Bank Rate was 0.1% at the beginning of the reporting period. April and May saw the economy gathering momentum as the shackles of the pandemic restrictions were eased. Despite the improving outlook, market expectations were that the Bank of England would delay rate rises until 2022.
- 2.3 UK CPI was 0.7% in March 2021 but thereafter began to steadily increase. Price rises slowly became more widespread, as a combination of rising global costs and strong demand was exacerbated by supply shortages and transport dislocations. The surge in wholesale gas and electricity prices led to elevated inflation expectations. CPI for February 2022 registered 6.2% year on year, up from 5.5% in the previous month and the highest reading in the National Statistic series. Core inflation, which excludes the more volatile components, rose to 5.2% y/y from 4.4%.
- 2.4 The labour market began to tighten and demand for workers grew strongly as employers found it increasingly difficult to find workers to fill vacant jobs. Having peaked at 5.2% in December 2020, unemployment continued to fall and the labour market data for the three months to January 2022 showed the unemployment rate at 3.9% while the employment rate rose to 75.6%. Headline 3-month average annual growth rate for wages were 4.8% for total pay and 3.8% for regular pay. In real terms, after adjusting for inflation, total pay growth was up 0.1% while regular pay fell by 1.0%.

- 2.5 With the fading of lockdown, activity in consumer-facing sectors improved substantially as did sectors such as oil and mining with the reopening of oil rigs. Gross domestic product (GDP) grew by an upwardly revised 1.3% in the fourth calendar quarter of 2021 according to the final estimate (initial estimate 1.0%) and took UK GDP to just 0.1% below where it was before the pandemic. The annual growth rate was revised down slightly to 7.4% (from 7.5%) following a revised 9.3% fall in 2020.
- 2.6 Having increased Bank Rate from 0.10% to 0.25% in December, the Bank of England hiked it further to 0.50% in February and 0.75% in March. At the meeting in February, the Monetary Policy Committee (MPC) voted unanimously to start reducing the stock of its asset purchase scheme by ceasing to reinvest the proceeds from maturing bonds as well as starting a programme of selling its corporate bonds.
- 2.7 The conflict in Ukraine added further volatility to the already uncertain inflation and interest rate outlook over the period. The Dow Jones started to decline in January but remained above its pre-pandemic level by the end of the period while the FTSE 250 and FTSE 100 also fell and ended the quarter below their pre-March 2020 levels.
- 2.8 Bond yields were similarly volatile as the tension between higher inflation and flight to quality from the war pushed and pulled yields, but with a general upward trend from higher interest rates dominating as yields generally climbed.  
The 5-year UK benchmark gilt yield began the quarter at 0.82% before rising to 1.41%. Over the same period the 10-year gilt yield rose from 0.97% to 1.61% and the 20-year yield from 1.20% to 1.82%.
- 2.9 The Sterling Overnight Rate (SONIA) averaged 0.39% over the quarter.  
1-month, 3-month, 6-month, and 12-month Money Market rates averaged 0.12%, 0.23%, 0.37%, and 0.50% respectively over the period. A summary of PWLB and key benchmark lending rates is included at Appendix A.

### **3. Treasury Management Outturn for 2021-22**

#### **3.1 Debt Management**

The Authority is currently debt free. Any potential borrowing is driven by the capital plan. There were no plans that necessitated borrowing during 2021-22.

#### **3.2 Investment Activity**

- 3.2.1 The Guidance on Local Government Investments in England gives priority to security and liquidity and the Authority's aim is to achieve a yield commensurate with these principles.
- 3.2.2 As mentioned in 1.4, SCC has managed Treasury Management activities under an agreed Service Level Agreement. Investments were made on the basis of aggregating funds in order to maximise the benefits for both bodies (including using SCC's "Comfund"). The current arrangement strategy of lending all surplus funds to SCC represents an investment that is virtually free from risk of counterparty default, as SCC is the only counterparty. Also, with MiFID II, SCC will continue to have access to products that would be beyond ENP.
- 3.2.3 Security of capital remained SCC's main investment objective. Current SCC approved counterparties are listed below. Those used during the year are denoted with a star.

<b>Bank or Building Society</b>			
Australia & NZ Bank	*	National Westminster	*
Bank of Scotland		Nationwide BS	*
Bank of Montreal	*	Nordea Bank	*
Bank of Nova Scotia		OP Corporate Bank	
Barclays Bank Plc		Oversea-Chinese Banking Corporation	
Canadian Imperial Bank of Commerce		Rabobank	
Close Brothers Ltd		Royal Bank of Scotland	
Commonwealth Bank of Australia		Santander UK	*
DBS Bank Ltd	*	Standard Chartered Bank	*
DZ Bank	*	Handelsbanken Plc	*
Goldman Sachs International Bank		Toronto-Dominion Bank	*
HSBC Bank	*	United Overseas Bank	
Landesbank Hessen-Thuringen	*		
Lloyds Bank	*		
National Australia Bank			

<b>Sterling CNAV Money Market Funds</b>			
Goldman Sachs MMF		Insight MMF	*
Deutsche MMF	*	Aberdeen Standard MMF	*
Invesco Aim MMF	*	LGIM MMF	*
Federated Prime MMF	*	SSGA MMF	*
JP Morgan MMF		Aviva MMF	*

<b>Other Counterparties</b>	
Other Local Authorities	* (49 Deals)
Debt Management Office	*
CCLA Property Fund	*
RLAM Credit Fund	*
M&G Corporate Bond Fund	*

- 3.2.4 SCC has continuously monitored counterparties, and all ratings of proposed counterparties have been subject to verification on the day, immediately prior to investment. Other indicators taken into account have been:
- Credit Default Swaps and Government Bond Spreads
  - GDP and Net Debt as a Percentage of GDP for sovereign countries
  - Likelihood and strength of Parental Support
  - Banking resolution mechanisms for the restructure of failing financial institutions i.e. bail-in
  - Share Price
  - Market information on corporate developments and market sentiment towards the counterparties and sovereigns
- 3.2.5 Fitch and Moody's revised upward the outlook on a number of UK banks and building societies on the Council's counterparty list to 'stable', recognising their improved capital positions compared to 2020 and better economic growth prospects in the UK. Fitch also revised the outlook for Nordea, Svenska Handelsbanken and Handelsbanken plc to stable.
- 3.2.6 In the first half of FY 2021-22 credit default swap (CDS) spreads were flat over most of the period and are broadly in line with their pre-pandemic levels. The successful vaccine rollout programme was credit positive for the financial services sector in general and the improved economic outlook meant some institutions were able to reduce provisions for bad loans. However, in 2022, the uncertainty engendered by Russia's invasion of Ukraine pushed CDS prices modestly higher over the first calendar quarter, but only to levels slightly above their 2021 averages, illustrating the general resilience of the banking sector.
- 3.2.7 As duration advice has been limited to 35-days on new bank lending (and the number of counterparties recommended has been significantly reduced by SCC Advisors, Arlingclose), there have been minimal opportunities to use banks, as they are either not in the market in this period, or rates have been negligible or even negative. In order to place deposits for longer maturities, and to pick up a better yield, SCC placed more deposits with UK Local Authorities. At times, this too has been difficult, as the deluge of money from Central Government has increased liquidity and reduced the number of Local Authorities looking to borrow money keeping rates suppressed. Having completed its full review of its credit advice on unsecured deposits, in late September SCC Advisors, Arlingclose, extended the maximum duration limit for UK bank entities on its recommended lending list from 35 days to 100 days; a similar extension was advised in December for the non-UK banks on this list.
- 3.2.8 In order to increase diversification of SCC's portfolio, more deposits were placed with UK Local Authorities. Forty-nine deposits were placed with Local Authorities during the year. This allowed for longer-dated maturities with excellent creditworthiness and an appropriate yield.
- 3.2.9 It should be emphasised that the current Authority strategy of lending all surplus funds to SCC represents an investment that is virtually free from risk of counterparty default, as SCC is the only counterparty.
- 3.2.10 The Treasury portfolio at the end of this and the previous financial year is set out below.

	<b>Balance on 31/03/2021 £000</b>	<b>Rate %</b>	<b>Balance on 31/03/2022 £000</b>	<b>Rate %</b>	<b>Average Balance £000</b>	<b>Average Rate %</b>
Revenue Balances	28	0.00	25	0.38	207	0.04
Comfund Balances	2,900	0.39	2,900	0.56	3,195	0.29
<b>Total Balances</b>	<b>2,928</b>	<b>0.39</b>	<b>2,925</b>	<b>0.56</b>	<b>3,402</b>	<b>0.27</b>

There was a minimal decrease of £3,000 in overall cash balances held by the Authority at 31st March 2022 as compared with 31st March 2021.

- 3.2.11 The average daily balance of the Authority's revenue cash was around £207k, a decrease of £73k, earning net interest at Base Rate minus 0.375%. Base rate averaged 0.19% over the year, but only went above 0.375% for part of February, and then March. Net interest earned on revenue was £73 compared to £0 for the year in 2020-21.
- 3.2.12 At year-end, revenue cash held by SCC was £25k. Minimising revenue cash enables a larger balance to remain invested in Comfund. The Comfund rate (net of fees of 2% of interest) earned more than the net revenue return of 0.04% by 0.23%.
- 3.2.13 Comfund investment averaged £3.195m over the year (£2.959m in 2020-21). Investment peaked at £3.8m in October and ended the year at £2.9m. Interest earned was 0.29% gross, 0.27% net, producing £8,902 income net of fees (£18,804 in 2020-21). Fees amounted to £182 (2% of interest received).
- 3.2.14 The ENPA combined average gross return of 0.27% was 0.08% higher than the average Base Rate for the year. This out-performed the benchmark used by SCC and was 4 basis points in excess of that for the average 3-month Money Market Rate. (see Table 1 in Appendix A).

#### **4. Compliance**

- 4.1 During the year, all ENPA treasury management policies, practices, and activities remained compliant with all relevant statutes and guidance, namely the MHCLG investment guidance issued under the Local Government Act 2003, the CIPFA Code of Practice for Treasury Management, and the CIPFA Prudential Code.
- 4.2 The DLUHC's current Guidance on Investments, revised 1<sup>st</sup> April 2018, reiterated security and liquidity as the primary objectives of a prudent investment policy. All lending was compliant with guidance issued by the DLUHC, and as SCC was the only counterparty for all funds for the year, this was achieved at minimal risk.
- 4.3 For completeness, and to comply with guidance, Prudential limits set, and actual outcomes are to be reported. All treasury activity was conducted within the benchmarks set as Prudential limits for prudent and sustainable capital plans, financing, and investment. Indicators approved for the year are set out in the left-hand columns, with actual outturns on the right.

### 1 Borrowing Limits

Authorised £100,000  
Operational £100,000

Actual
<b>Nil</b>
<b>Nil</b>

### 2 Maturity Structure

	Upper Limit %	Lower Limit %	Value	Actual %
< 12m	100	0	0.00	<b>0.0</b>
> 12m < 24m	0	0	0.00	<b>0.0</b>
> 24m < 5yrs	0	0	0.00	<b>0.0</b>
> 5yrs < 10yrs	0	0	0.00	<b>0.0</b>
> 10yrs	0	0	0.00	<b>0.0</b>
			<hr/>	
			0.00	<b>0.0</b>

### 3 Investments > 365 days

0	<b>0</b>
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**Gordon Bryant**  
**Head of Finance & Operations**  
**June 2022**



## Appendix A

**Table 1. Money Market Rates 2021-2022 Source = Bloomberg**

	O/N	7-Day	1-Month	3-Month	6-Month	12-Month	2-Yr SWAP
01/04/2021	-0.06	0.05	0.02	0.00	0.09	0.15	0.28
30/04/2021	-0.06	0.05	0.04	0.00	0.05	0.15	0.31
31/05/2021	0.01	0.05	0.04	0.00	0.05	0.15	0.31
30/06/2021	-0.06	0.05	0.04	0.05	0.10	0.15	0.37
31/07/2021	-0.06	0.05	0.04	0.05	0.11	0.17	0.43
31/08/2021	-0.06	0.05	0.04	0.05	0.10	0.19	0.48
30/09/2021	-0.06	0.05	0.03	0.11	0.16	0.19	0.72
31/10/2021	-0.06	0.08	0.10	0.21	0.45	0.70	1.23
30/11/2021	0.01	0.02	0.04	0.16	0.31	0.52	1.06
31/12/2021	0.06	0.20	0.14	0.35	0.22	0.52	1.19
31/01/2022	0.06	0.22	0.32	0.48	0.66	1.02	1.19
28/02/2022	0.40	0.41	0.48	0.78	1.08	1.40	1.19
31/03/2022	0.75	0.70	0.61	1.17	1.33	1.57	1.19
<b>Average 2021-22</b>	<b>0.05</b>	<b>0.15</b>	<b>0.12</b>	<b>0.23</b>	<b>0.37</b>	<b>0.50</b>	<b>0.76</b>
Minimum	-0.08	0.01	-0.50	-0.01	0.05	0.15	0.26
Maximum	0.75	0.70	0.89	1.18	1.52	1.57	1.23
Spread	0.83	0.69	1.39	1.19	1.47	1.42	0.97
<b>Average 2020-21</b>	<b>-0.08</b>	<b>-0.07</b>	<b>-0.05</b>	<b>0.01</b>	<b>0.07</b>	<b>0.17</b>	<b>0.17</b>
<b>Difference in average</b>	<b>+0.13</b>	<b>+0.22</b>	<b>+0.17</b>	<b>+0.22</b>	<b>+0.30</b>	<b>+0.33</b>	<b>+0.59</b>

**Table 2. PWLB Rates 2021-22 (Maturity rates unless stated)**

	5 Year	5 Year EIP	10 Year	15 Year EIP	30 Year	50 Year
01/04/2021	1.40	1.16	1.93	1.71	2.41	2.22
30/04/2021	1.40	1.16	1.91	1.70	2.34	2.13
31/05/2021	1.30	1.15	1.90	1.69	2.34	2.15
30/06/2021	1.36	1.15	1.81	1.62	2.25	2.07
31/07/2021	1.30	1.14	1.65	1.50	2.00	1.80
31/08/2021	1.32	1.18	1.66	1.51	2.01	1.80
30/09/2021	1.61	1.39	2.01	1.84	2.37	2.16
31/10/2021	1.77	1.63	2.03	1.92	2.15	1.90
30/11/2021	1.56	1.43	1.81	1.70	1.88	1.56
31/12/2021	1.80	1.66	2.00	1.90	2.17	1.88
31/01/2022	2.08	1.98	2.28	2.19	2.42	2.15
28/02/2022	2.19	2.10	2.44	2.31	2.63	2.42
31/03/2022	2.45	2.36	2.63	2.53	2.78	2.58
<b>Average 2021-22</b>	<b>1.65</b>	<b>1.50</b>	<b>1.98</b>	<b>1.84</b>	<b>2.27</b>	<b>2.04</b>
Minimum	1.25	1.09	1.59	1.44	1.80	1.45
Maximum	2.57	2.49	2.72	2.64	2.90	2.68
Spread	1.32	1.40	1.13	1.20	1.10	1.23
<b>Average 2020-21</b>	<b>1.70</b>	<b>1.64</b>	<b>2.01</b>	<b>1.86</b>	<b>2.51</b>	<b>2.33</b>
<b>Difference in average</b>	<b>-0.05</b>	<b>-0.14</b>	<b>-0.03</b>	<b>-0.02</b>	<b>-0.24</b>	<b>-0.29</b>

## EXMOOR NATIONAL PARK AUTHORITY

5 July 2022

### MEMBERS' ALLOWANCES SCHEME

#### Report of the Chief Finance Officer

**Purpose of Report:** To publish the amounts paid to Members during 2021/22 by way of the Members' Allowances Scheme adopted by the Authority for that year.

**RECOMMENDATION:** The Authority is recommended to NOTE the amounts paid to Members in 2021/22 through its Scheme for Members' Allowances.

**Authority priority:** Achieve by providing core services; getting best value from our resources; and improving our performance.

**Legal and equality implications:** Publication of the amounts paid to Members through the Members' Allowances Scheme is required under The Local Authorities (Members' Allowances) (England) Regulations 2003.

The equality and human rights impact of the recommendation of this report has been assessed as having no adverse impact on any particular group or individual.

**Financial and risk implications:** No financial or risk implications have been identified in publishing the amounts paid to members of the Authority by way of the approved scheme of allowances.

**Climate change response:** Nothing contained within this report will impact upon the Authority's ability to meet its climate change targets.

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#### 1. Introduction

- 1.1 Members agreed the Scheme of Members' Allowances to be operated in 2021/22 at the Authority's meeting held on 2 March 2021. The scheme adopted provided for:-
- Future in-year adjustments to Basic Allowances and Special Responsibility Allowances to be linked to staff pay cost of living awards.
- 1.2 The final pay award for staff and members for 2021/22 was 1.75%. This was agreed very late in the financial year and backdated increases were processed in March 2022.

#### 2. Scheme of Allowances 2021/22

- 2.1 The total allowances paid to Members for meetings attended during the year are set out in Appendix 1. The allowances and reimbursements paid in 2021/22 totals £79,999 (2020/21 = £78,457). This is a small increase but is still substantially lower than before the pandemic when travel costs were much higher.
- 2.2 The financial data in the appendix is supplemented by columns which show for each member the actual mileage claimed, the number of main meetings of the Authority, Standards and Final Accounts Committees attended by Members in the year, and the number of other meetings and training/ awareness events attended.

**Gordon Bryant**  
**Head of Finance and Operations**  
June 2022

**SUMMARY OF ALLOWANCES PAID TO MEMBERS 2021/22**

Member (Home town)	Basic Allowance £	Special Responsibility Allowance £	Sub-sistence £	Re-imbursment for Fares, Tickets etc £	Mileage Allowance £	Total Allowances paid £	Miles claimed in connection with Authority business	Main business meetings attended Actual/Possible	Other meetings and training events attended
<b>Mrs L Blanchard Tansley</b> (Parracombe)	2,864				90	2,954	200	9 / 11	14
<b>Miss A Davis</b> (Kentisbury)	2,864	4,296			147	7,307	328	10 / 12	22
<b>Mr R Edgell</b> (appointed to 06.05.21) (South Molton)	310					310		1 / 1	1
<b>Mr M Ellicott</b> (Exford)	2,864	1,432			122	4,418	296	15 / 15	13
<b>Mr D Elson</b> (Combe Martin)	2,864				52	2,916	115	7 / 11	17
<b>Mr J Holtom</b> (Parracombe)	2,864					2,864		11 / 11	15
<b>Mr J Hunt</b> (Wellington)	2,864			10	113	2,987	336	10 / 11	12
<b>Mr M Kelly</b> (Barnstaple)	2,864			24	129	3,016	512	10 / 11	16
<b>Mr M Kravis</b> (Blue Anchor)	2,864					2,864		7 / 11	11
<b>Mrs C Lawrence</b> (Minehead)	2,864				48	2,912	144	10 / 11	14
<b>Mr E Ley</b> (Bishops Nympton)	2,864					2,864	174	9 / 11	11
<b>Mr A Milne</b> (appointed from 07.09.21) (Porlock Weir)	1,623					1,623		4 / 5	8
<b>Mr R Milton</b> (West Anstey)	2,864	5,728			27	8,619	60	12 / 12	23
<b>Mrs F Nicholson</b> (East Anstey)	2,864					2,864		11 / 12	14
<b>Mr J Patinos</b> (Parracombe)	2,864	716		25	226	3,831	168	13 / 14	15
<b>Mr P Pilkington</b> (appointed to 03.05.21) (Wheddon Cross)	257					257		1 / 1	1
<b>Mr S Pugsley</b> (Withypool)	2,864	4,296			128	7,288	301	15 / 15	24
<b>Mr W Revans</b> (North Petherton)	2,864					2,864		9 / 11	8
<b>Mrs E Stacey</b> (Chudleigh)	2,864				81	2,944	270	10 / 15	5
<b>Mr N Thwaites</b> (Dulverton)	2,864					2,864		14 / 14	6
<b>Dr S Warren</b> (Ottery St Mary)	2,864			15	310	3,189	516	8 / 11	11
<b>Mrs P Webber</b> (Minehead)	2,864			5	32	2,900	105	6 / 11	10
<b>Mr V White</b> (Wheddon Cross)	2,864					2,864		10 / 12	12
<b>Mr J Yabsley</b> (appointed from 27.05.21) (Witheridge)	2,425			10	44	2,479	98	7 / 9	5
<b>TOTALS</b>	<b>61,894</b>	<b>16,468</b>	<b>-</b>	<b>89</b>	<b>1,548</b>	<b>79,999</b>	<b>3,525</b>		

**NB:**  
 - Mileage allowances paid vary because of the distances members have to travel to attend meetings  
 - Those members in particular who receive a special responsibility allowance attended a range of other meetings and events outside the recognised Authority meetings  
 - Some details of "Other meetings and training events attended" are noted from claims submitted by members. If members have chosen not to claim, it may mean that some meetings attended by that member are not included.

## EXMOOR NATIONAL PARK AUTHORITY EXMOOR CONSULTATIVE AND PARISH FORUM NOTES

of the meeting of the Exmoor Consultative and Parish Forum held  
on Thursday 17 March 2022 at 10:30am by Video Conference

### PRESENT

Mike Ellicott	Exmoor National Park Authority and Chairman of the Forum
Vivian White	Exmoor National Park Authority and Deputy Chair of the Forum
Liz Bulled	North Devon District Council
Alan Collins	Withypool and Hawkridge Parish Council
John Anson	Cutcombe Parish Council
Bill Gash	Exmoor Society
Robin Milton	ENPA Member
Chris Binnie	Resident
Steven Pugsley	ENPA Member
Andy Milne	ENPA Member
Philip Beauvais	Skilgate Parish
Catherine Nicholls	Winsford PC
Nick Thwaites	ENPA Member
Penny Webber	ENPA Member
Andrea Davis	ENPA Member
Leslie Silverlock	Exmoor Young Voices
Tony Howard	Withypool and Hawkridge Parish Council
Kevin Connell	Winsford Parish Council
Mike Kelly	ENPA Member
Luke Hoather	SW Lakes Trust
David Lewis	SW Energy Hub
Sarah Elwood	Somerset West and Taunton Council

### 1. Apologies for absence were received from:

Chris Garnsworthy	Western Power Distribution
Christine Lawrence	ENPA Member
Sarah Buchanan	Brompton Regis PC
Richard Partington	Dulverton Resident
Louise Crossman	Business Owner
Dean Kinsella	ENPA
Rachel Thomas	Exmoor Society
Jan Aldridge	Brushford PC

### National Park Authority staff in attendance:

Sarah Bryan, Chief Executive  
Dan Barnett, Access and Recreation Manager  
Hazel Malcolm, Business Support Officer (Note Taker)

- 2. MINUTES:** The [minutes](#) of the Forum meeting held on 16 September 2021 were agreed as a correct record.

**Matters Arising:** There were no matters arising

- 3. QUESTIONS FROM THE FLOOR (Submitted in advance):**

No Questions were submitted.

- 4. DISTRIBUTION OF POWER ON EXMOOR.**

This item was cancelled and is re-scheduled for the June ECPF meeting. Chris Garnsworthy, Distribution Manager for Western Power to talk about power distribution across Exmoor.

- 5. SW ENERGY HUB**

David Lewis, Heart of the South West Project Manager for the SW Energy Hub gave a presentation and advice on renewable energy scheme opportunities for local communities who are interested in developing community renewable energy projects.

The presentation slides can be found [here](#)

- 6. FAMILY FRIENDLY CYCLE TRAILS**

Dan Barnett Access and Recreation Manager for ENPA and Sarah Elwood Project Manager – Steam Coast Trail Project Officer (& also Active Travel & Regeneration, Somerset West and Taunton Council) gave a presentation and video on the proposals and consultation for the Family Friendly Cycle Trail feasibility study. Routes are being explored around Wimbleball Lake and along the coast around Porlock. The consultation will gather views on these proposals and also take more general comments or other suggestions in relation to opportunities to improve opportunities for cycling – especially for less confident or proficient cyclists.

The public consultation will be launched soon and once complete the findings will be reported back to ENPA Authority Members and publicised.

- 7. UPDATE ON THE LANDSCAPES REVIEW**

Sarah Bryan, Chief Executive Exmoor National Park Authority updated the Forum on the report on the Review of Landscapes (Glover Review.) Forum Members were reminded the Landscapes Review Consultation closes for responses on 9 April and that responses from individuals are welcomed. The presentation slides can be found [here](#)

- 8. EMERGING ISSUES OR TOPICS FOR WIDER DEBATE**

The Exmoor Young Voices Housing Summit is being held on 9 June. The findings will be presented at the next ECPF in June. Forum Members were reminded to send any issues for discussion at future Forum meetings to Hazel Malcolm [hamalcolm@exmoor-nationalpark.gov.uk](mailto:hamalcolm@exmoor-nationalpark.gov.uk)

- 9. DATE AND TIME OF NEXT MEETING**

The next meeting will be held on Thursday 23 June at 7pm in Withypool Village Hall.

- 10. OTHER BUSINESS OF URGENCY**

There was none.

# 13.1



## Committee Report

Application Number:	62/41/21/024
Registration Date:	26-Aug-2021
Determination Date:	20-Oct-2021
Applicant	Mr. S Hillier, Royanne Ltd
Agent:	Mr. J Woodward, Woodward Smith Chartered Architects
Case Officer:	Tom Jones
Site Address:	Lydiate Lodge, Rock Lodge Park, Lynton, EX35 6DN
Proposal:	Proposed demolition of existing former care home and erection of 9 no. dwellinghouses.
Recommendation:	Approval with conditions
Reason for bringing before Authority Committee:	In accordance with the Scheme of delegation since the Officer recommendation of approval is contrary to the Town Council view, which is an objection.

### Relevant History

62/41/04/017 - Part one / part two storey extensions – Approved - 05/14/2004

62/41/06/046 - Formation of footpath link between Hume Avenue and Rock Lodge Park for public use - Approved - 04/16/2007

62/41/17/030 - Proposed demolition of existing residential care home (use C2) - Refused - 02/07/2018

### Site Description & Proposal

The 0.23ha site is a former care home at the western end of Lynton. It comprises a disused building and its associated landscape and parking area. The eastern boundary is formed by a landscape strip with a hedgerow at its southern end. This sits between the site and Tennis courts and the Lynton and Lynmouth Bowls Club. The northern boundary is a public footpath, which borders a stream flowing east to west. An area of landscaping sits between the site and the footpath.

Yew House and a Grade II Listed Building, Rock Lodge, both residential properties, sit immediately to the west and above the site, with a bank and substantial hedgerow forming part of the boundary between the properties.

A group of residential bungalows run southwards from the site alongside the point of access, Rock Lodge Park.

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The building, Lydiate Lodge, was previously owned and run by Devon County Council as a care home. Deemed unviable, Devon County Council closed and, in 2015, sold the property.

The proposal is to demolish the buildings and construct nine dwellings in a terrace form with parking on the eastern side; together with landscaping to the east (front), west and north sides.

It is proposed that three of the properties would be Affordable Housing, with two Social Rent and one Affordable Rent; and six would be Principal Residence houses.

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### Consultee Representations

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The **ENPA Heritage Officer** advises that the site lies outside Lynton Conservation Area and that the primary impact of the proposed development in regard to the historic environment is to the setting of Rock Lodge.

Rock Lodge dates from c1840 and was extended in c1870. At the time of its construction and through to the early 20th century the building stood in isolation with commanding views towards the sea over Lynton. Aerial images from 1946 show considerable encroachment of development as Lynton grew when compared to the 1904 second edition OS maps. Despite the considerable change in its setting the building is still a prominent landmark on the hillside above the town, in particular when viewed from Lee Road.

The Officer considers that the existing 1960s building, to be demolished, is of no historic value and its large, uniform façade sits uncomfortably against other buildings in Lynton and Lynmouth. The building causes a significant degree of harm to the setting of Rock Lodge.

The Officer advises that although the proposed units would have a ridgeline about 4m higher than the existing building, their more irregular appearance would be likely to reduce the visual impact on Rock Lodge. The application indicates there will still be visible foliage between the roofs of the new development and Rock Lodge above. Maintaining this 'green break' is crucial if Rock Lodge is to maintain its prominence and not to appear as though it merges into the development.

The Officer concludes that the proposed development would have a neutral impact on the surrounding designated heritage assets; and has confirmed this opinion with respect to the revised proposals.

The **ENPA Wildlife Conservation Officer** in their initial response noted that the Ecological Assessment includes details of bat surveys which have confirmed the presence of a common pipistrelle day roost and lesser horseshoe (LHS) night roost.



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The emergence surveys were undertaken in 2017 and also confirmed the presence of common pipistrelle day roost, but the LHS roost was recorded this year during a daytime survey only. The Ecologist considered that the emergence data is too old, especially since the building has not been in use for several years; and expresses reservations with respect to how a LHS night roost has been classified by only undertaking daytime surveys. Noting that the location is a plant room the consultant also considers that there is potential for hibernation. An updated site assessment was requested.

Note of Planning Officer: further survey work has been completed and this will inform avoidance, mitigation and enhancement – pending any further comments of the Wildlife Officer, which are not available at the time of writing the report.

The **Environmental Health Consultant** (North Devon Council Environmental Protection Service) does not object and advises with respect to the wording of conditions, should planning permission be granted. The wording is provided at the end of this Report and covers land contamination, including asbestos; and construction phase impacts, including construction hours.

Following re-consultation the Consultant reviewed the amended plans and information and added further comment with respect to the detail of the proposed asbestos condition.

**South West Water** provides plans showing the approximate location of a public sewer and a public water main in the vicinity and advises with respect to matters to be included as Informatives if planning permission is granted.

SWW advises that the method proposed to discharge into a surface water body is acceptable and meets with the Run-off Destination Hierarchy.

**Wessex Water** advises that they do not cover the area

**North Devon Council Local Planning Authority** makes no comment.

Lynton Town Council 'resolved to refuse the proposals on the grounds of the adverse impact upon the amenity of neighbouring properties contrary to local plan policies GP1(f) and CE-S6(g), and in terms of massing, scale and height CE-S6(a). To refuse for reasons of unacceptable levels of traffic that would be generated relative to the site's road access, prejudicing road safety, contrary to policy AC-D2 (1, 2).'

The objection was maintained at the second consultation 'as the fundamental material planning concerns, as formerly expressed by Council, remain and that the affordable housing element has not been satisfactorily met by this application.'

**North Devon Council's Housing Enabling Officer** advises that the main driver should be affordable housing. The majority of the dwellings should therefore be

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affordable, with only the minimum amount of principal residence housing to cross-subsidise the affordable element. A viability assessment should be submitted by the applicant to establish the numbers that are viable. This would be tested by an independent assessor at the applicant's cost.

Devon Home Choice shows there are 27 households living in the parish of Lynton and Lynmouth registered as being in need of affordable housing for rent as of July 2021. Not all households tend to register themselves on the housing register as they don't think that they will have the opportunity to be housed so this figure is often significantly higher. It should be noted that although DHC data identifies the number of households living within the parish in housing need, it does not always provide sufficient information to firmly establish how long households have been resident in the parish or if they wish to remain in the parish; it is a snap shot in time and people's circumstances can change extremely quickly. In addition, some households may seek affordable home ownership options (shared ownership/discounted sale).

We don't hold data on numbers of households requiring some form of affordable housing for sale.

A Housing Needs Report dated November 2016 produced by Devon Communities Together showed that a Housing Needs Survey for Lynton and Lynmouth found 13 households were in housing need who could not afford to buy/rent on the open market and who held a local connection. Please note that there is an active development trust in the community of Lynton and Lynmouth that would certainly be interested in working with a developer and housing association to provide much needed affordable housing for the parish.

In response to the second consultation the Officer comments with respect to the revised proposals, with the following based on an understanding of the proposal being for two affordable homes:

**AFFORDABLE HOUSING REQUIREMENT:** The viability assessment presented various options including one that showed an acceptable positive land value with six units of affordable housing and only three open market so I am unsure why the two units of affordable housing are still being pursued and why the applicant is saying that this is policy compliant. Six units of affordable housing is a more appropriate outcome policy-wise for the site with the MINIMUM number of Principle Residence to cross-subsidise the build of the affordable housing. The six affordable dwellings option would be enabled by designing smaller units rather than the current large open market houses that are overshadowing the affordable housing – this is also mentioned in the viability assessment. The viability assessment specifically concludes “This demonstrates that an alternative scheme with smaller units could result in a scheme that only requires 3 of the 9 houses to be open market and would result in 6 affordable rented units rather than only 2 as proposed.”

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TENURE: Documents refer to “affordable rent” but in the worked examples they give a very low rent, which looks more like social rent. It seems to be below local Housing allowance levels for this site which is in the North Devon BRMA. This is great in terms of rent levels but setting a true affordable rent i.e. not as high as up 80% of open market rent but capped at local housing allowance rates would also put in more income into the site. It would be good to establish which Tenure they have tested the site on and get the rental income correct.

HOUSING NEED: As you know the Lynton & Lynmouth Development Trust and the Parish Council as well as the ENPA Local Plan are desperate for affordable housing in this housing crisis. There are currently 24 households living in the parish in housing need and another 5 just in those adjoining parishes that are within the North Devon administrative area. This only looks at rented housing need and does not include those that may live elsewhere but wish to return nor include those that have decided not to register due to waiting times and the lack of opportunity of new housing. In my view 2 out of 9 homes as affordable housing are not acceptable and more are viable as clearly demonstrated by the viability assessment with a change in layout. Further discussions with North Devon Council as the Local Housing Authority would be appreciated.

**Devon County Council Children’s Services Planning and Transport and Environment** identifies that the proposed 9 additional family type dwellings would generate an additional 2.25 primary pupils and 1.35 secondary pupils which would have a direct impact on Lynton Primary School and Ilfracombe Academy.

DCC advises that the designated primary and secondary schools for this site is forecast to have enough capacity for the number of pupils expected to be generated from this development and therefore a contribution towards primary or secondary education infrastructure would not be sought.

In order to make the development acceptable in planning terms an education contribution to mitigate its impact is requested towards secondary school transport costs due to the development being further than 2.25 miles from Ilfracombe Academy. The costs required are 1.35 Secondary pupils at £4.15 per day x 1.35 pupils x 190 academic days x 5 years = £5,322.00

The contribution has been calculated based on the DCC contract cost of transporting a pupil from the area of development to the named school. The number of academic days and years is based on the number of term days in a school year and the number of years a pupil will attend the school. The contribution will ensure pupils living within the development will have school transport available for every year they are attending the school.

All contributions will be subject to indexation using BCIS. It should be noted that education infrastructure contributions are based on March 2019 prices and any

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indexation applied to contributions requested should be applied from this date. The amount requested is based on established educational formulae (which related to the number of primary and secondary age children that are likely to be living in this type of accommodation) and It is considered that this is an appropriate methodology to ensure that the contribution is fairly and reasonably related in scale to the development proposed which complies with CIL Regulation 122.

In addition to the contribution figures quoted above, the County Council would wish to recover legal costs incurred as a result of the preparation and completion of the Agreement. Legal costs are not expected to exceed £500.00 where the agreement relates solely to the education contribution. However, if the agreement involves other issues or if the matter becomes protracted, the legal costs are likely to be in excess of this sum.

No other consultee comments have been received.

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### **Representations**

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Twenty representations have been received. Representations express general agreement with the principle of redevelopment, but object to the proposals. The following list is a summary, by the ENPA Planning Officer, of concerns raised in representations. Full details of representations are available on the Council's webpages.

- allowing usable buildings to be demolished and replaced with new buildings is contrary to achieving climate change targets;
- the loss of a purpose-built care home is a severe blow to the infrastructure of the community, more social care is required to meet the needs of an aging population;
- the development needs to be for affordable housing for people with a local connection;
- acute shortage of local people who are available to work requires more Affordable Housing;
- Properties must be permanent residents or rented as long term lets with no holiday use allowed;
- concern that if a binding contract is not established with a housing association prior to approval the applicant might be able to change the status of the property and sell the freehold;
- the Old Coach House and Yew House would be adversely affected;
- plots 7 and 8 would be 2.14 metres higher and plots 5 and 6 would be 2.59 metres higher than the existing building - any replacement buildings should be no higher than the existing building to protect amenity of neighbouring properties;
- need to match the footprint and height of the existing building;

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- the architect who designed Yew House took account of the unique position of its site to create a house that is sympathetic to its immediate surroundings;
  - proposals are not sympathetic to the immediate surroundings;
  - building materials should be 'traditional', including stone facings with brick quoins to fit in with the overwhelming majority of the Victorian and Edwardian buildings, in the village;
  - the existing building was in very good condition and sits matching the neighbouring bungalows in design and colour;
  - the existing building should be re-used to minimise carbon emissions;
  - with the only access to the development being via the hairpin bend on Station Hill, this will lead to an already difficult bend with poor visibility from Station Hill becoming more hazardous with the increased volume of traffic;
  - substandard forward visibility from, and of vehicles turning right from Station Hill / Lydiate Lane;
  - would exacerbate existing problems with parking – the road is steep and narrow;
  - parking would prohibit access for larger vehicles to enter the road;
  - some neighbours are vulnerable and particularly sensitive to noise;
  - the southern boundary appears to claim some of Yew House's garden;
  - the boundary wall is the responsibility of the owners of the Lydiate Lodge site;
  - the boundary of the development site includes the public footpath; and
  - risk of loss of the footpath.

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### Policy Context

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Exmoor National Park Local Plan 2011 – 2031 (including minerals and waste policies)

GP1	Achieving National Park Purposes and Sustainable Development
GP3	Spatial Strategy
GP4	The Efficient Use of Land and Buildings
GP5	Securing Planning Benefits - Planning Obligation
CE-S1	Landscape and Seascape Character
CE-S2	Protecting Exmoor's Dark Night Sky
CE-S3	Biodiversity and Green Infrastructure
CE-S4	Cultural Heritage and Historic Environment
CE-S6	Design and sustainable construction principles
CE-D1	Protecting Exmoor's Landscapes and Seascapes
CE-D2	Green Infrastructure Provision
CE-D3	Conserving Heritage Assets
CC-S1	Climate Change Mitigation and Adaptation
CC-D1	Flood Risk
CC-D5	Sewage Capacity and Sewage Disposal
CC-S6	Waste Management

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HC-S1	Housing
HC-S2	A Balanced Local Housing Stock
HC-S3	Local Occupancy Criteria for Affordable Housing
HC-S4	Principal Residence Housing
HC-D3	New Build Dwellings in Settlements
HC-D4	Accessible and Adaptable Housing for Exmoor's Communities
HC-D19	Safeguarding Local Commercial Services and Community Facilities
SE-S3	Business Development in the Open Countryside
AC-D1	Transport and Accessibility Requirements for Development.
AC-D2	Traffic and Road Safety Considerations for Development
AC-S3	Traffic Management and Parking
AC-D3	Parking Provision and Standards

## Lyn Plan 2013 – 2028

P1	Overall Objectives for New Development
ENV1	Location of Development & Enhancement of the Local Environment
E10	Parking
H1	Affordable Housing
H2	Local Connection
H3	Principal Residence Housing
S1	Loss of Services and Facilities

The National Planning Policy Framework (NPPF) is also a material planning consideration.

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### **Planning Considerations**

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#### **Principle of development**

Policy GP1 sets out criteria for achieving National Park Purposes and Sustainable Development. These include criteria (3e and 3f) that seek to ensure the efficient use of land, buildings, services and infrastructure; and to protect the amenities of local residents and conserve or enhance the quiet enjoyment of the National Park. Clause 1 of Policy GP3 establishes the aims of the spatial strategy as being to ensure that communities across the National Park continue to thrive so that they are economically resilient, environmentally sustainable, socially mixed and inclusive. Lynton and Lynmouth are identified as a Local Service Centre in the Local Plan. In Local Service Centres the scale of development is required to be proportionate to the settlement size and reflect the capacity of each settlement to accommodate new build development; positively responding to the surrounding landscape character, settlement form and pattern, and avoiding areas at risk of flooding (Clause 2, Policy GP3).

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Clause 3a) of Policy GP3 requires development to strengthen the role and function of the Local Service Centres to sustain and improve the wide range of services and facilities, to serve the needs of the settlement and surrounding communities, address locally identified needs for housing and improve employment prospects for the local area. New build development for local need affordable housing, business premises, and community services and facilities are acceptable in principle where well related to existing buildings in the settlements.

The proposed development would involve the demolition of a former community facility. In selling the property Devon County Council has indicated that the property is not likely to be suitable for meeting specialist housing needs.

ENPA gave detailed consideration to this matter when considering application reference 62/41/17/030, an application for flats on this site. At that time ENPA concluded that the case made by the applicant demonstrated that the principle of losing this community facility is acceptable, in accordance with criteria (a) and (b) of Policy HC-D19.

It is the view of the Planning Officer that the circumstances have not changed and the principle of redevelopment for housing remains acceptable.

### **Meeting housing need**

Policy HC-S1 Clause 1 states that the purpose of housing development in Exmoor National Park is to address the housing needs of local communities, with the principal identified need being for affordable housing with local occupancy ties. New housing development is supported in exceptional circumstances and where it addresses an identified local housing need for Affordable Homes that remain affordable in perpetuity, and which will be occupied by local persons in proven housing need in accordance with the local occupancy definition in HC-S3.

Policy HC-S1 does not make provision for housing solely to meet open market demand. Principal Residence market housing will only be permitted where it is essential to deliver local need affordable housing in a Local Service Centre or Village to meet an identified local need and it accords with Policy HC-S4.

Clause 1 of Policy HC-S2 requires development proposals to have regard to the existing housing stock in the locality. All new residential development is required to contribute towards the creation of sustainable, balanced and inclusive Exmoor communities by ensuring a mix of dwellings (in terms of size, type and tenure), that will meet the needs of present and future generations.

Clause 1 of Policy HC-S4 requires that any new market housing development will be Principal Residence housing and will only be permitted where it is required to enable the delivery of affordable housing to meet local needs.

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Clause 2 requires that where permission is granted for a Principal Residence market dwelling, a condition will be attached to ensure that the occupancy of the dwelling(s) is confined to a person's sole or principal residence.

The application proposes three Affordable Housing Units, with two to be let at Social Rent and one to be let at Affordable Rent level. The applicant has submitted with the application a Viability Study that they consider demonstrates a higher proportion of Affordable Housing would render the development unviable. Officers have reviewed the Study and consider that a higher proportion of AH could not be delivered without the scheme becoming unviable in terms of reasonable profit. The applicant advises that they have considered other approaches and that this scheme represents the optimum in terms of making a reasonable profit and delivering Affordable Housing that meets the most acute need.

Having considered the data available from Devon Home Choice it is the view of the Planning Officer that the proposed development would make a significant contribution to Affordable Housing; and is consistent with the objectives and requirements of Policies HC-S1, Housing; HC-S2, A Balanced Local Housing Stock; HC-S3, Local Occupancy Criteria for Affordable Housing; HC-S4, Principal Residence Housing; and HC-D3, New Build Dwellings in Settlements.

Tenure, occupancy and management of the properties would be the subject of a S106 Legal Agreement.

### **Landscape, heritage and design**

Policy CE-S1 and CE-D1 seek to protect the high quality, diverse and distinct landscapes and seascapes.

Policy CE-S4 requires the local distinctiveness, cultural heritage, and historic environment of Exmoor National Park to be conserved and enhanced; with the objective of ensuring that present and future generations can increase their knowledge, awareness and enjoyment of these special qualities and that development proposals affecting heritage assets and their settings, will be considered in a manner appropriate to their significance.

The proposal responds to pre-planning advice provided by ENPA in 2019; and to the comments made during public consultation undertaken in 2020. The principle of demolishing Lydiate Lodge and replacing it with residential properties is agreed by the applicant, community and ENPA.

Policy CE-S6 establishes criteria for achieving high quality design and requires development to be in keeping with the landscape / character, be accessible and safe and avoid significant harm to amenity.



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The proposed layout has the appearance of a terrace of properties on the western side of the site with the front elevations facing the east. The two northernmost units would be detached properties, the four central properties would be joined; with the two southernmost properties arranged as a maisonette, with a separate upstairs and downstairs flat, and a semi-detached house (the end property)

The design draws on styles in the locality, with each property having bay windows. The proposed materials are:

- red / brown brickwork plinth walls and footpaths;
- off-white render walls with grey cedar (fibre-cement) weatherboarding at high level;
- natural slate roofs with red clay ridge tiles;
- timber frame windows and doors with white aluminium cladding; and
- black uPVC gutters, downpipes, fascias and barge boards.

Two parking spaces are proposed for each dwelling, making a total of 18 parking spaces, in a 'yard' to the front of the properties; with a turning area surfaced with grasscrete.

A Landscape Plan illustrates how the western edge of the site would be enhanced through mature planting and management as grassland.

The applicant describes Lydiate Lodge as an incongruous building; and that replacing it with semi-detached dwellings with front gable ends would be more in keeping with Rock Lodge from an architectural perspective. The design includes gaps between the proposed roofs with the objective that the new development would not challenge the dominance of Rock Lodge in this setting; and would break up the impact on Yew House, which also sits to the west in close proximity.

The applicant proposes that the highest roof point in the proposal (ridge of Plot 2) would be at 165.83, about 4m higher than the ridge of the former care home; and 13m lower than Rock Lodge. A continuous fascia of green planting would be provided at the base of Rock Lodge.

Units 1 to 8 progressively drop in finished floor level following the contour of the surrounding land south to north. The height of the buildings is generally about 8m.

The design seeks to ensure that the proposal would be well integrated in the locality and respectful of neighbouring properties, whilst delivering the floor space required to keep the development viable.

The existing distance between Yew House and the former care home is about 16m. The proposed development would increase this slightly to about 17m, measured between Yew House and Unit 8. Following a site visit to review the impact on this property, the Planning Officer requested that the level of the northernmost properties

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are reduced. The applicant has reduced the finished floor level of these two properties by 340cm. The proposal is considered to have an impact on the upstairs sitting area and garden sitting area of Yew House, but the combination of the lowered height and 'breaking up' the structure with pitched roofs is considered to avoid significant harm in terms of being intrusive or overbearing.

In this respect the potential for the loft windows to look towards Yew House is noted. The design specifies obscure glazed and top opening windows.

Policy CE-S6 requires development proposals to deliver high quality sustainable designs that positively contribute to the setting; use materials and design elements that complement the local context; reinforces landscape character and the positive arrangement of landscape features; have regard to health and well-being; improve safety, inclusivity and accessibility for those who live, work and visit there; would not detrimentally affect the amenities of surrounding properties and occupiers including overlooking, loss of daylight, overbearing appearance; or have any other adverse environmental impacts.

The policy preamble to Policy CE-S6 says that some building materials are not considered appropriate in the National Park for aesthetic reasons. It says, for example, some UPVC windows can have much thicker, un moulded frames than timber, and the designs and detailing are for the most part limited in terms of being effective replacements for traditional timber designs.

The design is considered to be appropriate to the setting; and proposes appropriate materials, including wood doors and windows and black coated metal guttering and drain pipes.

The ENPA Heritage Officer concludes that the proposed development would have a neutral impact on the surrounding designated heritage assets.

Clause 2 of Policy HC-S2 requires a good standard of accommodation by being constructed to be neither too large nor too small.

The layout and plans illustrate how each property will achieve this. Clause 3 of Policy HC-S2 encourages the achievement of Building Regulations Requirement M4(2) for accessible and adaptable dwellings or successor regulations; and Clause 4 encourages construction in accordance with Building Regulations Requirement M4(3) (or successor regulations) and will be encouraged where a specific local need for a wheelchair adaptable or accessible dwelling is identified. The Planning Statement describes the measures that have been incorporated to achieve this, including:

- Front doors with clear access width of at least 775mm (960mm structural opening), and level threshold;
- Internal doors on the ground floor with clear width of at least 775mm (838mm doors);

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- Cloakroom within entrance storey to have outward-opening door, clear space to access the WC (at least 750mm deep and 900mm wide) and basin positioned to avoid impeding access;
- The applicant describes the access and parking arrangements as being via a private road with parking area as a succession of small-scale spaces linking to the existing footpaths. Front elevations have been designed to face the 'courtyard space', adding meaning and security.

Rear elevations will be facing the family garden in a typical Victorian arrangement. Proposed gardens at the back are about 6m wide, with depth ranging from 8 to 15m.

Due to the lay of the land, each garden is roughly split in two:

- a lawned/paved area, level with the dwelling and for family activities, separated from neighbouring gardens via 1.8m-high timber close-boarded fences for privacy and security; and
- a rising part at the rear, following the lay of the land. This retains the existing rough grassland, to be complemented by wildflower seeding, leading up to mature hedge planting. Boundaries between plots are marked here by 1m-high timber picket fences, permeable and lightweight so as to provide wildlife and visual continuity in this semi-natural setting.

Discussion with the applicant raised concern with respect with what was considered to be the cramped nature of the front parking and landscaping area. The applicant removed a property that was proposed for this area and re-provided that unit within the 'terrace' by sub dividing one property into two maisonette. This not only enabled an additional Social Rent Unit, but in reducing the development footprint, allows space for a better – and acceptable – approach to landscaping, parking and manoeuvrability.

The design ensures all dwellings overlook the communal yard used for parking and turning; this space is also well connected to existing footpaths used by the local community, along the east and north boundaries. This, coupled with discreet external lighting, will ensure the development feels safe and secure.

Landscaping seeks to protect the amenity of residents; protect and enhance wildlife; and to facilitate sustainable rain water drainage.

It is the view of the Planning Officer that the layout and design is appropriate to the setting. Viewed from the east the development would represent an improvement in terms of landscape and character and does not harm the setting of the Listed Building to the rear or other heritage assets.

There would be some harm to the amenity of Yew House, but this is not considered to outweigh the delivery of much needed local affordable dwellings. In accordance with Policy HC-S2A it is appropriate to attach a condition removing permitted development rights in respect of extensions.

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## Ecology

Policy CE-S3 requires development to conserve and enhance wildlife, habitats and sites of geological interest within the National Park will be given great weight.

The application is informed by an Ecological Report, which finds that the site / buildings are used by bats, in the plant room and flying / feeding along the western boundary hedge; and that it provides habitat for Badger, dormice, nesting birds, reptiles and amphibians, in existing grassland, tall ruderal and scrub vegetation.

Other proposed wildlife measures are identified on the submitted plans and seek to achieve a net gain in the biodiversity of the site. This includes:

- Bat shed
- bat boxes
- Hibernacula (habitat pile)
- Wildlife pond
- bird boxes
- bee bricks

The most valuable part of the site is the western edge, which includes mature planting and grassland. This will be retained, protected (see Construction Exclusion Zone in landscaping plan) and enhanced, through the provision of wildflower seeding and additional native planting (more than 100 new plants, including but not limited to hawthorn and blackthorn).

The proposal seeks to minimise external lighting through the use of a few low-level bollards in the parking yard and wall downlights at dwellings' entrances, designed and shown on plans to avoid illuminating the retained habitats. Lights from windows at the rear of the properties are comparable to the amount of openings/light from the former care home, thus not significantly increasing the impacting on nocturnal activity of bats and dormice.

Other measures to enhance biodiversity include a bat shed, bat boxes, hibernacula (habitat pile), a wildlife pond, bird boxes, and bee bricks. These are placed at suitable locations and shown on plans. The applicant considers that the measures would achieve net biodiversity gain.

It is also notable that removal of potential contaminants on site, protection of existing mature planting and wildlife, and the creation / improvement of habitat detailed in the landscape plan have the potential to enhance biodiversity, including wildflower grassland, native planting, small pond, hibernacula, bat shed and boxes, bee bricks and bird nest boxes.

Additional survey information was provided during the process of considering the application. The Landscape Plan incorporates appropriate measures to secure enhancement and conditions can be applied to ensure appropriate avoidance and mitigation measures. The Wildlife Officer has not had the opportunity to comment on the final detail. A verbal update will be provided at the Committee meeting.

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## **Highways**

The applicant proposes that the site would continue to be accessed via Rock Lodge Park with the proposed yard providing parking and turning areas. The yard would be privately owned and run by a management company and serve the proposed 9 dwellings.

Two parking spaces, a total of 18, would be provided for each dwelling. The private road / yard would also provide access for waste collection and emergency services. The applicant advises that a preliminary check was carried out with the Local Authority Building Control to confirm that proposed access / turning provisions for fire services comply with current Building Regulations; and that the Principal Building Control Surveyor is satisfied that the proposed development would comply with regulations.

The DCC Highway Authority has not provided any comments. The DCC Transport Officer commented, however, on the previous application, which was for 15 flats. Noting the traffic generation of the previous use and the proposed, the Officer did not consider there to be a material increase in vehicle movements as a consequence of the development. The Officer raised concern with respect to substandard forward visibility from, and of, vehicles turning right from Station Hill / Lydiate Lane into the site and the substandard estate road layout and construction.

At a site visit the Planning Officer observed on street parking, presumably by existing residents, around the entrance to the access road; and is aware that in the summer months congestion can occur. Whilst noting that this informal parking could be better organised in the interests of safety, as an existing situation and in the context of previous comment by the Highway Authority, it is not reasonable to require the applicant to seek any specific improvement.

It is the view of the Planning Officer, and in the context of paragraph 111 of the NPPF, that the development would not result in severe impacts on the highway in terms of capacity and safety. Therefore, the proposed access and parking arrangements are considered to be acceptable.

## **Foul water and drainage**

Two foul water pipes currently run through the site: one south to north along the eastern boundary, and one running from behind the bungalows that lie to the south. The former would be retained, including a suitable maintenance strip, with discharge from the proposed dwellings into this sewer. The latter will be diverted within the application site in order to accommodate proposed units 1 and 2.

Surface water would be collected from reduced impermeable areas, temporarily stored into an attenuation tank within the curtilage of the site, then discharged at a

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controlled and attenuated rate into the stream that runs within the application site, on the north side.

Two foul water pipes currently run through the site: one south to north along the eastern boundary, and one from the neighbouring North Devon Homes' bungalows. The former would be retained, including a suitable maintenance strip, and discharge from the proposed dwellings would be into this sewer, which has spare capacity. The latter would be diverted within the application site to accommodate proposed units 1 and 2. All details would be agreed with South West Water prior to works commencing.

The proposed development would reduce the impermeable area and takes into consideration the proposed roofs and yard. All other areas, including patios, lawns and grassland, have been designed as permeable areas.

Furthermore, the reduced amount of run-off water would be managed by discharge into an attenuation tank below the parking yard; and subsequently into the adjacent stream at an attenuated and controlled rate. This would cater for storm events.

The Planning Officer considers that the proposals would benefit the public sewerage system and provide appropriate management of the risk of flooding downhill from the site.

### **Sustainability / climate change**

In May 2019 the UK government declared a climate emergency, Exmoor National Park followed this by declaring a Climate Emergency in October 2019. To help meet this challenge the Local plan includes policies which seek to influence, contribute and challenge development to help meet the Climate Emergency. GP1 'Achieving National Park Purposes and Sustainable Development' Sets out that the need to consider future generations, through sustainability and resilience to climate change and adapting to and mitigating the impacts of climate change.

Policy CC-S1 'Climate Change Mitigation and Adaption' states that climate change mitigation will be encouraged, development which reduces demand for energy, using small scale low carbon and renewable energy, looks to situate development which avoids sites that would put wildlife at risk together with measures which avoids the risk of flooding. Furthermore,

Policy CC-S5 'Low Carbon and Renewable Energy Development' seeks to support small scale renewable energy schemes that assist in contributing towards reducing greenhouse gas emissions and moving towards a carbon neutral National Park and policy CE-S6 'Design and Sustainable Construction Principles' seeks to incorporate sustainable construction methods which future proof against climate change impacts, including flood risk.

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Paragraph 152 of the National Planning Policy Framework requires that “the planning system should support the transition to a low carbon future in a changing climate taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

## **Energy Efficiency**

The scheme has been designed to maximise the use of solar gain (east-west orientation) to minimise the use of fossil fuels in the heating and lighting of the dwellings.

As natural gas is not available on site the applicants proposes that the dwellings will be equipped with electric air source heat pumps to run underfloor heating / radiators and hot water for sanitary use. The electric consumption from the grid will be complemented by energy produced on site by the photovoltaic panels proposed on the new roofs, amounting to about 4-6 panels per dwelling, which will produce electricity in excess of 1kWh per dwelling.

The scheme is well located to local facilities, shops and services.

As per Building Regulations requirements, water usage will be limited to 125 litres per person per day. This is usually achieved via low water usage taps and showerheads and dual flush WCs. Rain water harvesting (from the roofs, with small individual tanks within the gardens of each plot) will also be considered for watering the lawns.

The development makes use of previously developed land. The concrete yard areas shall be crushed on site to create hardcore for use within the new buildings. Materials, in particular the bricks and aggregate shall be sourced locally while doors and windows shall be produced off-site within efficient and clean factory environments.

There would be an impact on the climate from the construction process and sourcing of construction materials. In this respect it is recognised that the potential to reduce embodied energy can be optimised by the refurbishment of existing buildings. In this instance and considering the design elements that seek to reduce the use of carbon derived energy, it is considered that the proposals a reason for refusal could not be justified on this basis.

## **Contamination and Waste Management Strategy**

The application is supported by a Demolition and Construction Management Plan, implementation of which would be a condition if planning permission were granted.

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A suitable pre-development programme of work would incorporate the comments of the Environmental Health Consultant and include

- safe removal of oil tank;
- preparation and submission to ENPA for approval of detailed report by Geo-environmental engineer, outlining remediation measures as necessary;
- preparation and submission to ENPA for approval of a Construction Phase Plan incorporating programme and details of all demolition and construction works, incorporating required remediation measures and an appropriate approach to reuse and recycling of material.

Once the properties are occupied recycling and waste will be stored in dedicated areas within the site for collection by the Local Authority.

### **Scheme management**

The applicant proposes that:

- the affordable units would be sold freehold to an affordable housing provider (Registered Social Landlord), who would rent out the dwellings at controlled rates to local residents, as per ENP's guidelines;
- the other units would be the subject of a principal residence covenant and sold freehold;
- the communal parking / turning yard would remain private, owned by a management company that will manage its upkeep on behalf, and at the expense of, the owners of the dwellings.

The above would be included in a s106 Legal Agreement.

A management company would be established with the remit including, but not be limited to, the upkeep and maintenance of the following areas:

- private road and parking spaces (tarmac, cleaning, leaves);
- communal footpaths
- recycling / waste store
- surface water drainage and attenuation tank

### **Other matters**

A commensurate payment (to be recalculated on the basis of the revised proposals) towards secondary school transport costs would be secured in a s106 Legal Agreement.

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## **Human Rights**

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The provisions of the Human Rights Act 1998 and Equality Act 2010 have been taken into account in reaching the recommendation contained in this report.

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## **Conclusion**

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Having considered the data available from Devon Home Choice it is the view of the Planning Officer that the proposed development would make a significant and appropriate contribution to Affordable Housing. The internal layout and configuration are consistent with the objectives and requirements of the Local Plan. The proposals are considered to be in accordance with Policies HC-S1, Housing; HC-S2, A Balanced Local Housing Stock; HC-S3, Local Occupancy Criteria for Affordable Housing; HC-S4, Principal Residence Housing; and HC-D3, New Build Dwellings in Settlements.

The scale, orientation, form and designed respect the setting and would result in an improvement to the landscape and character when viewed from the north, east and south. Although there would be some impact on a residential property to the west, it is considered that the proposals would not result in significant harm to neighbours' amenity and it is noted that the proposals include robust and mature boundary treatment along western boundary.

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## **Recommendation**

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Planning permission is granted with conditions and a Section 106 Legal Agreement to secure necessary financial contributions and Affordable Housing provision:

1. The development hereby approved shall be begun before the expiration of three years from the date of this consent.

Reason: In the interests of proper planning control.

2. The development hereby approved shall not be carried out except in complete accordance with the approved drawings:

- Location Plan reference R231 20 201
- Proposed Site Plan reference R231 20 204
- Landscape Plan reference R231 20 206
- Plots 1, 2 and 3 plans and elevations reference R231 20 301
- Plots 4, 5 and 6 plans reference R231 20 3021
- Plots 4, 5 and 6 elevations reference R231 20 3022
- Plots 8 and 9 plans and elevations reference R231 20 303
- Site Sections reference R231 20 502
- Scheme Management Plan reference R231 20 210

Reason: For the avoidance of doubt and to ensure the works accord with the approved details.

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3. Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking and re-enacting that Order with or without modification), express planning permission shall be obtained for any development within classes A – F of Part 1 of the Schedule 2 of the Order.

Reason: to protect neighbouring amenity and preserve the character of the area the hereby approved dwellings identified as plots 4 to 9 on approved plan 'Proposed Site Plan', reference R231 20 204, shall not be occupied otherwise than by a person as his or her only or principal home. The occupant(s) shall supply to the Local Planning Authority (within 14 days of the Local Planning Authority's request to do so) such information as the Local Planning Authority may reasonably require in order to determine compliance with this condition. For the avoidance of doubt the dwelling shall not be occupied as a second home or as a unit of holiday letting accommodation.

Reason: In accordance with the policies of the Development Plan, in particular Policies HC-S4 and RT-D3 of the Exmoor National Park Local Plan 2011 - 2031.

4. Other than that indicated on the approved drawings (to be detailed in Decision Notice) and notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting those Orders with or without modification), no additional external lighting shall be attached to the development hereby approved without the prior written agreement of the Local Planning Authority. Any approved external lighting shall then be installed and operated in accordance with an agreed lighting scheme..

Reason: To safeguard the visual amenity, landscape character and dark night sky of the National Park.

5. A detailed landscape plan will be submitted to and agreed in writing by the Local Planning Authority prior to development. This will include biodiversity enhancement measures

Reason: in the interest of enhancing biodiversity, and conserving the landscape and character of the setting.

6. Prior to commencement of demolition the results of a Phase 2 intrusive investigation and testing of the site shall be submitted for the written approval of the Local Planning Authority to determine whether any contamination remediation of the site is required. The Phase 2 investigation shall be undertaken in accordance with the full recommendations set out in the Phase 1

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Geo-Environmental Assessment Report by South West Geotechnical Ltd dated March 2021, The report shall be prepared by a suitably qualified person and be sufficient to identify any and all potential sources of significant contamination on any part of the development site, having regard to current standards and good practice guidance. Where remediation of any part of the site is found to be required, a remediation scheme shall be submitted to and approved in writing by the local planning authority. The scheme shall include details of quality assurance, verification and certification requirements in accordance with established best practice. The construction phase of the development shall be carried out in accordance with the agreed details and, where relevant, verification reports and completion certificates shall be submitted for the written approval of the local planning authority.

Reason: To ensure that risks from land contamination to future users of the land and neighbouring land, together with those to controlled waters, property and ecological systems are identified and, where necessary, remediated in accordance with the National Planning Policy Framework.

7. Prior to demolition of the existing buildings, the asbestos containing materials (ACMs) identified within the Hatch Consultancy Refurbishment and Demolition Survey Asbestos Report dated May 2021 and any other ACMs encountered during removal works, shall be removed and disposed of by appropriately licensed contractors in accordance with asbestos regulations and health and safety guidance.

Reason: To ensure that the health of site workers, neighbouring residents and the public are protected from the potentially harmful effects of asbestos containing materials.

8. Prior to the commencement of development, including any demolition, site clearance, groundworks or construction within each sub-phase (save such preliminary or minor works that the Local Planning Authority may agree in writing), a Construction Environmental Management Plan to manage the impacts of demolition and construction during the life of the works, shall be submitted to and approved in writing by the Local Planning Authority.

For the avoidance of doubt and where relevant, the CEMP shall include:

- a) measures to regulate the routing of construction traffic;
- b) the times within which traffic can enter and leave the site;
- c) details of any significant importation or movement of spoil and soil on site;
- d) details of the removal and disposal of materials from site, including soil and vegetation;
- e) the location and covering of stockpiles;
- f) details of measures to prevent mud from vehicles leaving the site including

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- wheel-washing facilities;
  - g) control of fugitive dust from demolition, earthworks and construction activities;
  - h) a noise control plan which details hours of operation and proposed mitigation measures;
  - i) location of any site construction office, compound and ancillary facility buildings;
  - j) specified on-site parking for vehicles associated with the construction works and the provision made for access thereto;
  - k) a point of contact (such as a Construction Liaison Officer or site manager) and details of how complaints will be addressed
  - l) measures for identifying and dealing with any asbestos containing materials.

The details so approved and any subsequent amendments as shall be agreed in writing by the Local Planning Authority shall be complied with in full and be monitored by the applicants to ensure continuing compliance during the construction of the development.

Reason: To minimise the impact of the works during the construction of the development in the interests of highway safety and the free flow of traffic, and to safeguard the amenities of the area. To protect the amenity of local residents from potential impacts whilst site clearance, groundworks and construction is underway.

9. During the construction phase no machinery shall be operated, no process shall be carried out and no deliveries taken at or dispatched from the site outside the following times:
  - a) Monday to Friday 08.00 to 18.00;
  - b) Saturday 08.00 to 13.00; and
  - c) nor at any time on Sunday, Bank or Public holidays.

Reason: To protect the amenity of local residents.

10. Prior to the commencement of development biodiversity enhancement measures will be agreed in writing with the LPA. This will be informed by the ecology surveys and the Ecology Report. Agreed measures will be implemented in full and managed and maintained in perpetuity.

Reason: in the interest of enhancing biodiversity

11. Windows and doors will be timber; and gutters and downpipes to be black powder-coated metal.

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Reason: in the interests of clarity and certainty, and to ensure character is preserved.

12. Energy requirements will be supplemented using electric air source heat pumps and roof mounted photovoltaic panels.

Reason: in the interests of addressing the causes of climate change.

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### Informatives

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#### **Monitoring of Development**

The applicant and developer are reminded that it is their responsibility to ensure that the requirements of each planning condition are met and that the works are undertaken in accordance with the approved plans. Any failure to meet the terms of a planning condition or work which does not accord with the approved plans leaves the applicant/developer liable to formal action being taken. The National Park Authority endeavours to monitor on site the compliance with conditions and building works. This has benefits for applicants and developers as well as the National Park. To assist with this monitoring of development the applicant/developer is requested to give at least fourteen days notice of the commencement of development to ensure that effective monitoring can be undertaken. The Planning Section can be contacted at Exmoor National Park Authority, Exmoor House, Dulverton, Somerset, TA22 9HL or by telephone on 01398 323665 or by email [plan@exmoor-nationalpark.gov.uk](mailto:plan@exmoor-nationalpark.gov.uk).

#### **Positive & Proactive Statement**

This Authority has a pro-active approach to the delivery of development. Early preapplication engagement is always encouraged. In accordance with the requirements of Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, in determining this application, Exmoor National Park Authority has endeavoured to work positively and proactively with the agent/applicant, in line with the National Planning Policy Framework, to ensure that all relevant planning considerations have been appropriately addressed to achieve a positive outcome.

#### **Water and waste water infrastructure**

South West Water will need to know about any building work over or within 3 metres of a public sewer or lateral drain. We will discuss with the applicant whether their proposals will be affected by the presence of our apparatus and the best way of dealing with any issues as they will need permission from South West Water to proceed.

Please note that no development will be permitted within 3 metres of the water main, and ground cover should not be substantially altered.

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Should the development encroach on the 3 metre easement, the water main will need to be diverted at the expense of the applicant. The applicant and agent are advised to contact the Developer Services Planning Team to discuss the matter further.

The consultation response provides a link to the table of distances of buildings and structures from a public sewer; with further information regarding the options to divert a public sewer available:

[www.southwestwater.co.uk](http://www.southwestwater.co.uk)

### **Clean Potable Water**

South West Water is able to provide clean potable water services from the existing public water main for the above proposal. The practical point of connection will be determined by the diameter of the connecting pipework being no larger than the diameter of the company's existing network.

### **Foul Sewerage Services**

South West Water is able to provide foul sewerage services from the existing public foul or combined sewer in the vicinity of the site. The practical point of connection will be determined by the diameter of the connecting pipework being no larger than the diameter of the company's existing network.

The applicant can apply to South West Water for clarification of the point of connection for either clean potable water services and/or foul sewerage services. For more information and to download the application form, please visit our website [www.southwestwater.co.uk](http://www.southwestwater.co.uk), click the link for developers

### **Surface Water Services**

The applicant should demonstrate to your LPA that its prospective surface run-off will discharge as high up the hierarchy of drainage options as is reasonably practicable (with evidence that the Run-off Destination Hierarchy has been addressed, and reasoning as to why any preferred disposal route is not reasonably practicable):

1. Discharge into the ground (infiltration); or where not reasonably practicable,
2. Discharge to a surface waterbody; or where not reasonably practicable,
3. Discharge to a surface water sewer, highway drain, or another drainage system; or where not reasonably practicable, and
4. Discharge to a combined sewer (Subject to Sewerage Undertaker carrying out capacity evaluation)

### **Conditions and informatives and the submission of further details**

Please check all the conditions and informatives attached to this Decision Notice. If there are any conditions which require submission of details and/or samples prior to work commencing on site it is vital that these are submitted and agreed in writing by the Local Planning Authority before work starts. Given the High Court's interpretation of the Planning Acts and their lawful implementation it is unlikely that the Local Planning Authority will be able to agree to a sample/details after the commencement of works if

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that sample/details should have been approved prior to commencement. If a sample/detail is not agreed as required prior to commencement and works have started then it is likely that this matter may only be able to be rectified by the submission of another application. To avoid delay, inconvenience and the need to submit a further application, please ensure that all appropriate details/samples are submitted and agreed at the specified time.

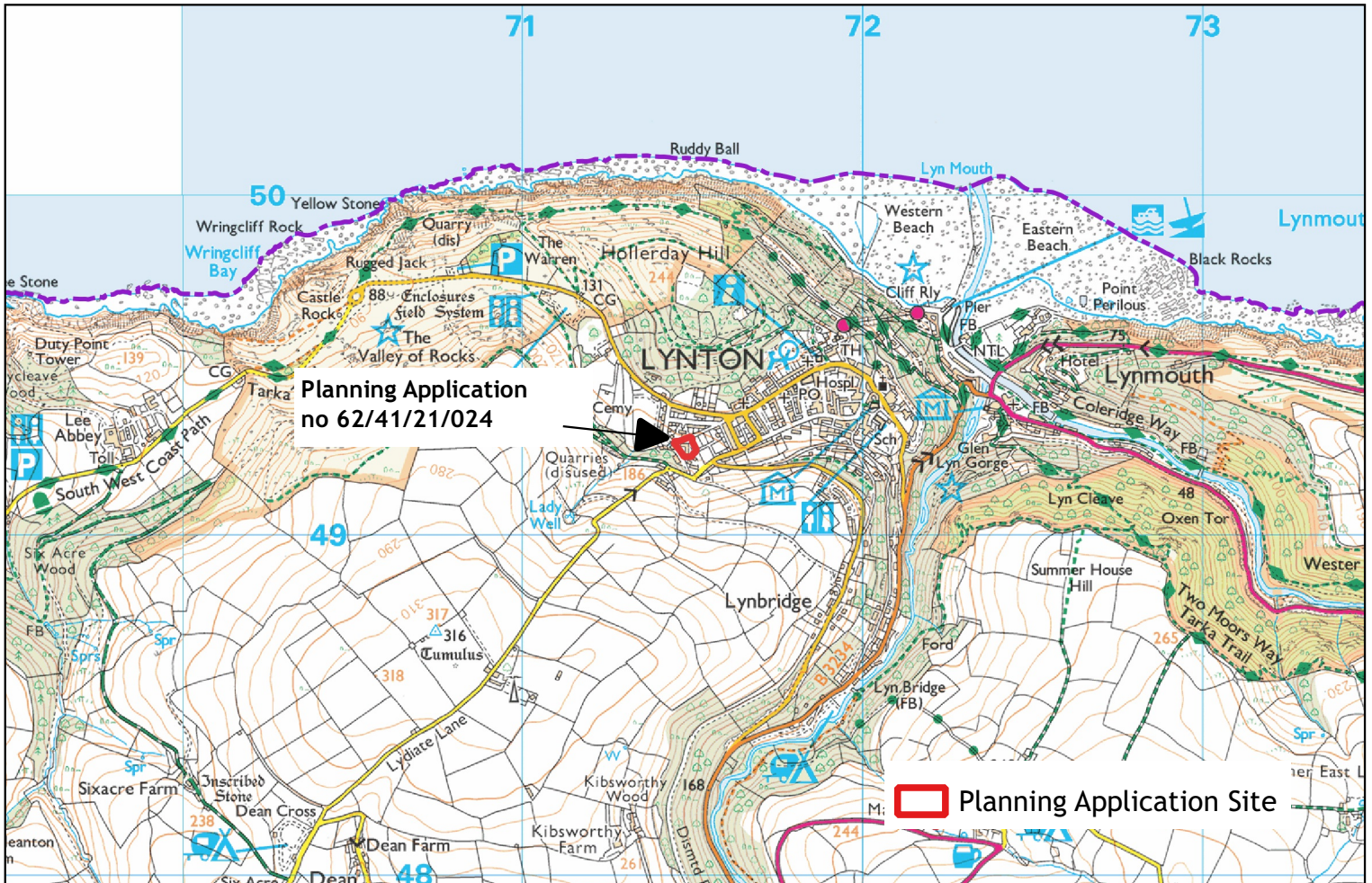
Please also note that due to other decisions of the High Court it is now not normally possible for the Local Planning Authority to agree to minor amendments to approved applications on an informal basis. The Department of Communities and Local Government have introduced a process whereby it is now possible to apply for a non-material amendment to a permission. This can deal with changes to plans which do not fundamentally alter the form of permission but are a variation to the approval. The appropriate form is available by request at Exmoor House or by downloading from the National Park Authority web site. Applications can be made via the Planning Portal.

Please ensure that works comply with the approved plans so as to avoid the possibility that works are unauthorised and liable for enforcement action.



Site Map  
Scale 1:2500

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Overview Map  
Scale 1:20,000

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## 13.2



### Committee Report

Application Number:	6/35/22/101
Registration Date:	11-Mar-2022
Determination Date:	20-Jun-2022
Applicant:	Mr M Weatherlake
Agent:	Mr. N Furze
Case Officer:	Tom Jones
Site Address:	Land adjoining B3224 at Treborough Common - Easting 300250: Northing 135050, Treborough, Watchet
Proposal:	Proposed storage of timber and wood chipping operation used in connection with the applicant's existing combined heat and power generating business on land form part of the parking area previously granted planning permission (6/35/08/101) for the nearby equestrian course. Resubmission of application 6/35/21/103. (Part retrospective).
Recommendation:	Refusal.
Reason for bringing before the Authority Committee:	This application is brought before Committee in accordance with the Approved Scheme of Delegation because the recommendation of the Officer is contrary to the recommendation of Brompton Regis Parish Council, which supports the application.

#### Relevant History

6/35/06/101 Change of Use of land to equestrian. Approved 03/07/2006

6/35/08/101 Retrospective application in respect of Change of Use of land to equestrian. Approved 05/20/2008

6/35/21/103 Proposed storage of timber and wood chipping operation to be used in conjunction Refused 01/20/2022

6/35/97/103 Proposed storage of stone - Retrospective Application, Treborough Common Refused 09/02/1997

#### Site Description & Proposal

Planning permission is sought to create an area within a larger field to store timber and to carry out occasional wood chipping in association with a combined heat and

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power operation. The application seeks to regularise the situation where the land is being used without planning permission for this purpose.

The area that is the subject of the application lies immediately to the north of the B3224 highway that runs from Wheddon Cross, in the west, to the Brendon Hill Methodist Church, linking onwards to roads heading towards Brompton Regis.

The site is part of an elevated area of land within a wider landscape at Treborough Common. The southern boundary comprises a substantial row of mature trees with the north, west and eastern boundaries being open farmland.

The land is approached from an existing access to the B3224 and sits immediately to the east of the track that runs in a north easterly direction from this access to the Combined Heat and Power (CHP) plant.

The application is a revised version of a previous application (ENPA reference 6/35/21/103) for the same use on the same site.

In the previous scheme the storage area was to be excavated to a depth of 300mm with the material used to form surrounding earth embankments. With this revised application no excavation works or embankments are proposed. Fencing would be installed to define the edge of the storage area with native planting providing a landscape screen.

The application area measures approximately 34m (east-west) by 18m (north-south) A large wood chipping machine would be brought to site, typically every three to four weeks, positioned by the stored wood and used for in the order of 4 to 5 hours.

The proposals are illustrated in:

- Drawing 0522/10 Amended location plan
- Drawing 0522/2/A Amended site layout plan

A revised landscape plan is also provided.

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### Consultee Representations

**Brompton Regis Parish Council** – supports, noting that ‘these developments can only make this established business more sustainable.’

**Somerset County Council (Highway Authority)** – On the basis the use is ancillary to the one granted consent against P/A 6/35/16/102, and would not result in an increase in traffic, advises that Standing Advice can be applied.

The **ENPA Landscape Officer** comments that the revised proposal for a timber storage area is in the same location and the same size as the refused application (approximately 34 x 18m). The amendments include omission of the banks around the storage area and the pond. In place of the bank is a 1m high post and wire fence and hedgerow.

The Officer notes that excavation and ground modelling is no longer required, but that the proposal remains at odds with the landscape character of the Eastern Enclosed Farmed Hill with Commons Character Area, which is open and

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expansive. One of the issues / forces for change identified for this character is the localised examples of prominent storage areas, including machinery and scrap.

The Officer comments that the timber storage area would be seen in close proximity from the adjacent bridleway and footpath for a short distance before the landform drops away to the north from the broad back of the ridge. The trees on the roadside hedgebank would form a backdrop, so the storage area would not be visible on the skyline. These trees would also screen it from the road. The screening provided by this row of trees is dependent on them not being laid or coppiced in the way adjacent sections of hedgerow have been, as the storage area would be more visible in the landscape if they were, given its elevation. In longer views from the north and north east, the storage area would not be visible.

The planning statement puts forward a suggestion for an alternative planting scheme, wrapping native tree planting around the storage area, which on balance would be more effective as a screen than the proposed hedgerow and more appropriate to the landscape setting.

The revised proposal would cause less harm to the landscape than the original application, although it would still introduce a feature that is at odds with the open landscape of the common. The development in this location would still be isolated, away from any buildings or farmstead it is associated with.

The **ENPA Historic Environment Officer** notes that the revised proposal no longer includes the grading of the area and the creation of bunds or banks, meaning that there is less likelihood of below ground archaeological impact and does not advise further archaeological work. The Officer notes, however, that in historic landscape terms, this was once an open landscape, part of Treborough Common, and the creation of new small enclosures is not in keeping with the historic landscape - in conflict with policy SE-S3.

The Officer commented on the previous planning application (reference 6/35/21/103) and the relevant comments are summarised: 'Treborough Common has a rich history. With much of the Brendon Hills ridge, it appears to have been largely unenclosed until the second half of 19th century. Until that time it was an open moorland landscape with prehistoric burial mounds along the high ridge which was also crossed by the unenclosed Herepath or Harepath, a reputed Saxon routeway. Many of the parishes used this earlier landscape to mark their boundaries and the parish boundary runs along the southern side of the proposed development. In the later 19th-century the area was developed for iron mining and a railway was built to the south of the road. Abandoned in the early 20th century this relict landscape is now one of Exmoor's Principal Archaeological Landscapes (PAL 44: West Somerset Mineral Railway and associated mineworkings) which lies to the south of the proposed development. A period of late 19th century enclosure and short-lived cultivation appears to have gone out of use by the post-second world war period (ENP HER number MSO8352). One of these late field enclosures (now in the same modern field as the proposed development) was used to house a US military / army camp occupied for a short time during preparations for the D-Day landings in 1944. The northern end of the proposed development may impact on a rectangular block relating to the use of the camp. The proposed development with the creation of new banks would detract from the historic landscape and

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earthmoving may have an unassessed impact on remains of the military camp and earlier prehistoric landscape and field system.

**ENPA Public Rights of Way and Access Officer** – comments that the revised application differs to the original in that a planting scheme is provided. Whilst this is welcomed, the Officer draws attention to the definitive line of the public footpath which, whilst not in use, passes through the line of proposed beech trees to be planted. If the planting can leave enough space for this definitive line, then this will avoid making this ‘offline’ situation worse.’

Comments made on the previous planning application that are of relevance are that the public footpath also has permitted bridleway access with the kind permission of the owner – a permitted bridleway also leaves runs away from the site parallel to the road.

The proposed timber storage does not impact directly on either the legal or the used line of the public rights of way – the track is already used for private vehicular access and there is good visibility and wide verges so I do not consider that traffic associated with the proposed use will have an impact on users of the right of way. The timber will be visible to users of the public footpath / permitted bridleway but would not spoil people’s enjoyment of the right of way.

Please ensure that during development and use of the site, the public right of way remains unobstructed and easy to use at all times.

No other consultee representations have been received.

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### Representations

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No neighbour representations received.

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### Policy Context

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Exmoor National Park Local Plan 2011 – 2031

GP1 – General Policy: Achieving National Park Purposes and Sustainable Development

GP3 – Spatial Strategy

CE-S1 – Landscape and Seascape Character

CE-D1 – Protecting Exmoor’s Landscapes and Seascapes

CE-S2 – Protecting Exmoor’s Dark Night Sky

CE-S4 – Cultural Heritage and Historic Environment

CE-D3 – Conserving Heritage Assets

CE-S6 – Design and Sustainable Construction Principles

SE-S1 – A Sustainable Exmoor Economy

SE-S3 – Business Development in The Open Countryside

RT-D12 – Access Land and Rights of Way

AC-D2 – Traffic and Road Safety Considerations for Development

CC-S1 – Climate Change Mitigation and Adaptation

CC-S5 – Low Carbon and Renewable Energy Development

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The National Planning Policy Framework (NPPF) is also a material planning consideration.

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### Planning Considerations

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The main material planning considerations in this case are the principle of development, the design, scale and materials, and the impact on the landscape, neighbouring amenity and highway safety.

#### **Principle of development**

The key policies for making a judgement with respect to the acceptability of the proposed development at Policies GP1, GP3, CC-S5, SE-S1 and SE-S3.

Policy GP1 sets out criteria for achieving National Park Purposes and Sustainable Development. These include high quality design, the efficient use of land, buildings, services and infrastructure; protecting the amenities of local residents; conserving or enhancing the quiet enjoyment of the National Park; and supporting the health and socio-economic wellbeing of local communities.

Policy GP3 establishes the Spatial Strategy for Exmoor, with the key objective being to focus new development within named settlements.

Policy SE-S1 encourages development that would strengthen, enhance and diversify the Exmoor economy, business and employment. Proposals should demonstrate that they will not have an unacceptable adverse impact including in terms of their operations, activity, and scale, on local amenity, landscape character, cultural heritage, sensitive habitats and wildlife.

Policy CC-S5 supports low carbon development where this contributes to energy supply, is compatible with the landscape, do not compromise the natural beauty, wildlife, cultural heritage or historic environment; and provide environmental enhancement.

The proposed development and activity entail the storage and processing of timber from outside the applicant's holding with the end product being woodchip for a CHP facility. The proposal is essentially an extension of the business site, approximately 1.15km to the north, where the combined heat and power building is located. It would be used ancillary to that site / activity. It is the view of the Planning Officer, therefore, that the application should be determined in the context of Policy SE-S3 of the Local Plan, which relates to business development in the open countryside; and not under the provisions of Policy SE-S4 (forestry) of the Local Plan.

In this respect it is noted that in a 1991 appeal decision in Wyre Forest, the sawing of logs was considered to fall outside what could be regarded as ancillary to forestry and in a 1991 appeal in Colchester, the fact that timber had been removed from the estate where it originated and then stored and sawn from a different planning unit was considered to be the crux of the argument that such a use was not ancillary to forestry.

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Policy SE-S3 states that proposals for extensions to existing business sites or buildings that are well related to an existing group of buildings on a farmstead or in a hamlet where there is an existing dwelling will be permitted in accordance with Policy SE-S1 and where the scale and appearance of the development are compatible with local landscape character.

It is the view of the Planning Officer that the site is not well related to the applicant's building group where the combined heat and power facility is located or any other buildings group. It is not a farmstead or within a hamlet. The isolated location within the open countryside leads to a conflict in principle with Policy SE-S3, criterion 5, which states that 'Business use in buildings which stand alone or which do not relate well to existing buildings and are not part of a farm group or hamlet will not be permitted.' The isolated location and harm to the landscape, natural beauty, and cultural heritage conflicts with Policy CC-S5.

The agent has emphasised the importance of the CHP plant to local energy supply, local employment and to the local economy. The supporting text to Policy SE-S3 makes no reference to exceptional circumstances where development might be permitted in an isolated location. It is the view of the Planning Officer that this might only be the case if the application is a matter of overriding national importance.

The agent notes that the National Planning Policy Framework (NPPF) at paragraph 85 states that 'planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.'

It is the view of the Planning Officer, however, that the provisions of the NPPF do not provide any policy reasons to over-ride the requirements of Policy SE-S3, criterion 5.

At a site visit on Wednesday 6th of April, the Planning Officer was invited by the agent to consider whether there would be a suitable site nearer to the business site. The Officer discussed this possibility with the agent. The agent explained that other sites have been explored and discounted, for various reasons, by the applicant. The agent advised that the applicant has confirmed that other fuel types for the combined heat and power system are now being considered following approval for the use of other fuel types. This means that there is now a need for an area for storing and processing timber.

The Planning Officer considers that the availability of other sites for storage and processing wood is not a material consideration in making a judgement on the application that is the subject of this report. In the interests of clarity, however, it is noted that in the Officer Report for a previous application for the same use on this

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proposed site stated that 'Officers may be able to take a pragmatic decision on the latter if the storage area was adjoining the business site'. The Planning Officer writing this report holds the same view.

It is also noted that when considering planning applications for the CHP plant (ENPA references 6/35/17/101 [Retention of extension and other alterations on the combined heat and power plant building together with the proposed raising of roof on part of wood chip storage building (part retrospective)] and 6/35/16/102 [Proposed additional use of agricultural and forestry buildings together with land for the installation and operation of wood chip powered combined heat and power system]) the issue of the possible need to store wood on site was not raised by the applicant and agent. Permission was granted with conditions that would control the noise associated with processing of materials.

It is acknowledged that the site would be used as part of a business use that provides energy to the public and regard has been given to a planning permission that was granted at Committee for a wood storage area near Allercott Farm. However, neither of these circumstances are considered to resolve the conflict with policy, particularly as the latter relates to another site in the National Park and each planning application should be judged on its individual merits.

The applicant has provided confidential financial information regarding the business. This demonstrates the financial investment the applicant has made and the benefits that arise to the local community from benefits such as employment. The benefits are acknowledged but are not considered to be such a scale that the recommendation can deviate from the requirements of the Local Plan. The investment that the applicant has made is also acknowledged, but it is the view of the Planning Officer that this is not a material consideration for this planning application.

The agent also advises that if this CHP business was not operating felled woodland timber would have to be transported out of the area, possibly Wales which increases mileage for heavy vehicles which is not good for the environment or sustainability. The benefits are acknowledged but are not considered to be such a scale that the recommendation can deviate from the requirements of the Local Plan.

The agent advises that the originally envisaged wood chipping operations have not taken place in nearby woodland areas, or at source for a number of reasons, these include; no local material being available and the impact that this has had on the distance to site for the transporting the wood chips and the associated machinery, space, adverse ground condition, proximity to noise sensitive buildings. Off site chipping is still carried out when a nearby source of material becomes available including when hedge laying operations are being carried out on local farms and the surplus trimmings / timber can be turned into wood chips rather than being burnt on the fields. These operational issues, advises the agent, have resulted in chipping material having to be sourced from further afield but as near as possible to his premises. Most of the timber used to power the CHP machines is delivered by log transporters to the applicant's land where it is chipped. The agent states that 'It was recognised towards the end of 2017 that the original practice of stockpiling large quantities of timber on this land could not continue

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because of the objections from the Exmoor National Park Authority.’ This led to a ‘Just in time’ principle with smaller quantities of material being brought onto the land and machined as soon as possible about every 2-3 weeks. This practice has, on occasion, failed due to adverse weather conditions, machinery failure or miss communication with timber suppliers. This means that there are occasions when the timber is un-expectantly not available so there is a need to store a certain amount on site.

Having considered these points made by the agent it is the view of the Planning Officer that a key reason for the application is to eliminate the need for vehicles to travel on the farm track from the highway to the CHP plant and back. Whilst that might be more convenient and maybe reduce costs for the running of the plant, this does not outweigh the conflict with Policy SE-S3, which does not support isolated development. In the interests of clarity, there is no documented ‘objection’ to on site storage.

The Officer is of the view that the planning application cannot be supported due to the conflict with Policy SE-S3. In the interests of providing a clear and robust report to inform the decision, the following text addresses other material considerations. The key issues are impact on the landscape, impact on heritage; design, scale and materials; and impact on highway safety.

### **Impact on the landscape / design, scale and materials**

Policy CE-S1, CE-S2 and CE-D1 seek to protect the high quality, diverse and distinct landscapes and seascapes; and to protect Exmoor’s Dark Night Sky.

Policy CE-S3 and paragraphs 174 and 176 of the NPPF require that development conserves and enhances wildlife, habitats and sites of geological interest within the National Park. Harm to the landscape with the National Park is given great weight.

Policy CE-D1 advises that development will be permitted where it can be demonstrated that it is compatible with the conservation and enhancement of Exmoor’s landscape. Policy CE-S2 refers to Exmoor’s dark night sky and advises that, among other things, the tranquillity and dark sky experience of the Exmoor National Park Dark Sky Reserve and the National Park as a whole, will be maintained and improved.

Policy CE-S4 requires the local distinctiveness, cultural heritage, and historic environment of Exmoor National Park to be conserved and enhanced. Policy CE-D3, Clause 3 specifically seeks to protect Heritage Assets and their Settings.

Policy CE-S6 requires development proposals to deliver high quality sustainable designs that, amongst other matters, positively contribute to the setting, reinforce landscape character and the positive arrangement of landscape features, not detrimentally affect the amenities of surrounding properties or other adverse environmental impacts.



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The edge of the storage area would be defined by timber post (split sweet chestnut) with wire fence. A native hedge would be planted to straddle the fencing and/or additional trees planted outside of the storage area.

The applicant proposes that within the storage area timber would be stored in two piles. One of these timber piles would be used to store timber up to a height of 3m for short term periods of up to 7 days prior to it being chipped and transported to the CHP site. Material being stored for any longer time would be limited to a height of 2.4m. The piles of short term and long-term storage will alternate from time to time but it envisaged that the higher height would generally be kept on the lower southern side of the site.

The Authority's Landscape Officer considers that the proposed planting scheme, wrapping native tree planting around the storage area would be more effective as a screen than the previously proposed hedgerow and more appropriate to the landscape setting.

The Officer concludes that although the revised proposal would cause less harm to the landscape than the original application, it would still introduce a feature that is at odds with the open landscape of the common; and that the development in this location would be isolated, away from any buildings or farmstead with which it is associated.

In this respect and in the context of Policy CE-S4 and Policy CE-D3, the consultation comments of the Historic Environment Officer are relevant to the determination of this application. It is the view of the Planning Officer that the isolated setting at the edge of an historic landscape, formed by an open common, would be materially harmed by this proposed development, particularly in terms of the impact on landscape character.

The development would be seen from the nearby public rights of way and it would be viewed as isolated development that is not well related to an existing building group or settlement. This would result in material harm to the landscape character and, to a lesser extent, landscape appearance.

It is considered that the proposal to use wooden fencing and native tree planting to mitigate the landscape impact are generally in accordance with the objectives of Policy CE-S6, notably these are appropriate materials, and the development would not be overbearing in appearance. The development would not, however, reinforce landscape character and would result in some harm to the setting, in conflict with the Policy.

The agent has emphasised the importance to this proposal that an area measuring 30m x 50m is allocated for parking in association with equestrian permissions (6/35/06/101 and 6/35/08/101) co-incides with the area subject to this application. The Planning Officer notes that this land might from time to time be occupied by horse related vehicles, and most intensively when there is a cross country event. In this respect it is noted that in the Committee Report for application reference 6/35/08/101 the Planning Officer states that '... the applicant has advised that the allocated car parking area (as shown on the proposal plans) will not be covered with hardstanding, but instead remain as existing ... The retention of the existing

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grass area is considered to be preferable visually and, therefore, there are no objections to this proposal. The applicant is aware that should, at a later date, he wish to provide a hardened parking area, it would be necessary to submit a fresh planning application.'

Whilst parking use would have an impact on the landscape there are no permanent structures associated with this use. The potential impact of parked vehicles is considered to be limited.

### **Impact on Highway Safety and Public Rights of Way**

The Highway Authority, Somerset County Council, have commented that on the basis the use of the application site is ancillary to the combined heat and power business site and would not result in an increase in traffic, standing advice can be referred to.

The access to the site is using an existing entrance. The visibility splays and access arrangements are considered to be sufficient to allow safe access from and egress on to the road without compromising highway safety. The development is therefore compliant with Policy AC-D2 of the Local Plan.

The ENPA Public Rights of Way and Access Officer advises that public footpath WL26/10 and public bridleway WL26/15, which passes just to the west of the proposed development would not be directly impacted. The Officer advises that, if permitted, planting would need to leave enough space for the definitive route. This could be addressed by a condition, meaning that the proposals would not be in conflict with Policy RT-D12.

### **Other matters**

The proposed development would not be likely to harm biodiversity. The proposed planting, which could be secured by condition, would deliver biodiversity enhancement.

In May 2019 the UK government declared a climate emergency, with Exmoor National Park following this by declaring a Climate Emergency in October 2019. To help meet this challenge the Local plan includes policies which seek to influence, contribute and challenge development to help meet the Climate Emergency.

Policy GP1 'Achieving National Park Purposes and Sustainable Development' Sets out that the need to consider future generations, through sustainability and resilience to climate change and adapting to and mitigating the impacts of climate change.

Policy CC-S1, 'Climate Change Mitigation and Adaption'; and Policy CC-S5, 'Low Carbon and Renewable Energy Development' state that climate change mitigation will be encouraged and support small scale renewable energy schemes. Policy CE-S6 'Design and Sustainable Construction Principles' seeks to incorporate sustainable construction methods which future proof against climate change impacts, including flood risk.

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Paragraph 152 of the National Planning Policy Framework requires that ‘the planning system should support the transition to a low carbon future in a changing climate taking full account of flood risk and coastal change.’

In this respect the agent has also emphasised the relevance of the text of the NPPF at paragraphs 8c, 157 and 158. Paragraph 8c sets an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Paragraphs 157 and 158 require local planning authorities to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and approve the application if its impacts are (or can be made) acceptable.

It is recognised that the proposed development would support the running of an existing CHP plant. The benefits to the operation of the plant are not, however, considered to be such that the conflict with Local Plan Policy can be over-ridden.

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### **Human Rights**

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The provisions of the Human Rights Act 1998 and Equality Act 2010 have been taken into account in reaching the recommendation contained in this report.

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### **Conclusion**

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The development would be seen from the nearby public right of way and it would be viewed as isolated development that is not well related to an existing building group or settlement. This would result in material harm to the landscape character and, to a lesser extent, landscape appearance. The main driver of Policy SE-S3 is to require development to be near to existing built form is to protect the landscape as well as to ensure sustainable development. As such, the matter of landscape is another reason it is contrary to that policy and is contrary to Policies CE-S1 and CE-D1.

It is recognised that the design, scale and materials of the proposed development and scope of activity are sensitive to the local environment, and it is concluded that there would not be material harm to neighbouring amenity or highway safety.

The benefits to energy security and the local economy are also recognised.

However, the compliant aspects of the application and the benefits of the application are not considered to outweigh the in principle policy conflict and the landscape harm. In this respect it is noted that great weight is given to conserving

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and enhancing landscape and scenic beauty in National Parks, as required by Paragraph 176 of the National Planning Policy Framework.

The Planning Officer does not consider there to be material considerations that over-ride the conflict with Policies SE-S3 CE-S1 and CE-D1 of the Local Plan.

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### Recommendation

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The planning application should be refused for the following reason:

1. The application site is not well related to the group of buildings that form the business site that this proposed development would be ancillary to. Policy SE-S3 of the Exmoor National Park Local Plan 2011 – 2031 requires extensions to business premises to be well related to an existing group of buildings. This proposed development would represent isolated development in the open countryside that is not well related to any existing building group. This isolated position, together with the incongruent form of the development on the edge of an agricultural field, not only conflicts with Policy SE-S3, but also results in material harm to the landscape character of the common and its historic value. The application is therefore contrary to Policies GP1, CE-S1, CE-D1, CE-S6, SE-S1 and SE-S3 of the Exmoor National Park Local Plan, and Paragraphs 174 and 176 of the National Planning Policy Framework.

and that an Enforcement Notice is served requiring the cessation of the use of the land within the application red line area for the storage of wood and the removal of wood and other materials not associated with the permitted equestrian use.

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### Informatives

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#### **Positive and Proactive Statement**

This Authority has a pro-active approach to the delivery of development. Early preapplication engagement is always encouraged. In accordance with the requirements of Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, in determining this application, Exmoor National Park Authority has endeavoured to work positively and proactively with the agent/applicant, in line with the National Planning Policy Framework, to ensure that all relevant planning considerations have been appropriately addressed to achieve a positive outcome. In this case, the planning objections to the proposal could not be overcome.

#### **Appeal to the Secretary of State**

If you want to appeal against the decision of the Local Planning Authority then you must do so within 6 months of the date of this notice.

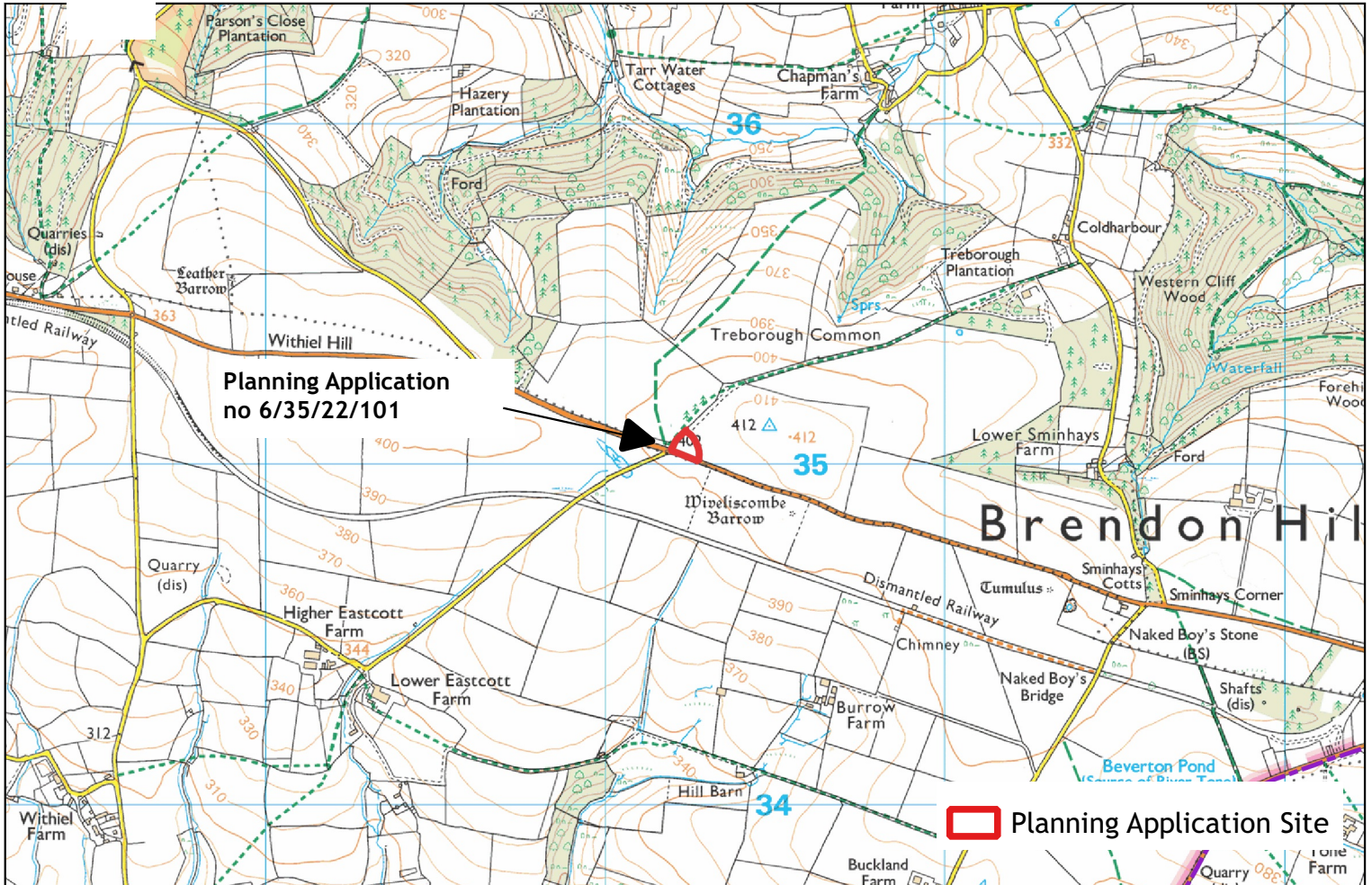


Planning Application no 6/35/22/101

Planning Application Site

Site Map  
Scale 1:2,500

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Planning Application no 6/35/22/101

Planning Application Site

Overview Map  
Scale 1:20,000

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# 13.3



## Committee Report

Application Number:	62/11/22/008
Registration Date:	22-Apr-2022
Determination Date:	14-Jun-2022
Applicant	Mrs S Applegate
Agent:	Mr. N Staddon, Staddons Architectural Services
Case Officer:	Yvonne Dale
Site Address:	Glenthorne, The Towers, Road From County Gate To Wellfield, Brendon, Devon, EX35 6NQ
Proposal:	Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for the Proposed Establishment of England Coast Path.
Recommendation:	Approve subject to conditions
Reason for bringing before Authority Committee:	Exmoor National Park Authority are the applicant.

### Relevant History

There is no relevant history.

### Site Description & Proposal

Planning permission is sought for the proposed establishment of part of the England Coast Path at Glenthorne, Brendon.

The Glenthorne Estate was created in the 19th Century by the Rev W S Halliday, who purchased the whole of the parish of Countisbury between 1829 and 1866. Glenthorne House was constructed and largely completed by 1831. Other buildings in connection with the Estate, including Home Farm, the Garden Cottage and kitchen garden, an icehouse, a bath house and a reservoir were constructed in the period 1830s – 1850s. The designed landscape around Glenthorne, including terraced walks and paths are shown on the 1890 Ordnance Survey map. The networks and paths traverse the slopes between the main drive and link the house with the walled gardens and Garden Cottage, Home Farm, Glenthorne Beach and Yenworthy Combe.

The Glenthorne Estate lies on a remote part of Exmoor's coast between Lynton and Porlock, north of County Gate and is accessed from the A39 via a steep and windy access drive that runs down the steep combe to the house. The house is built on the

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cliffs with dramatic views across the Bristol Channel. Glenthorne House is a grade II listed building.

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### Consultee Representations

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#### North Devon Council – Planning – 25/4/22 – No Observations

**ENPA - Historic Environment Officer - 10/5/22** - The designed landscape of Glenthorne is little known and documented but survey work completed during the design stages of the proposed England Coast Path through this area have increased understanding of this important element of the landscape and informed the current proposal and we are grateful to the owners and Access Team for facilitating these surveys. As mentioned in the submitted archaeological survey, care will be needed to ensure that areas of repair to any supporting stone walls and footpath creation match the existing style and fabric. No further archaeological recording is recommended but the Historic Environment Team should be consulted if any original surfacing or other features come to light during works.

#### Brendon & Countisbury Parish Council 12/5/22 – Support

**ENPA – 12/5/22 - Wildlife Officer** Given the nature of the application, I am glad to see the inclusion of an ecology report (Somerset Ecology Services, February 2021). The methods, presentation of results and recommendations are generally satisfactory. Appropriate recommendations are provided to avoid impacts to habitats and species which are known to or may be present on site and I suggest these are secured by way of appropriate condition. These recommendations include further ecological input if the works are delayed more than 12 months beyond the date of the letter, I therefore suggest that we include a condition that requires a pre-works ecological walkover survey.

**ENPA - Future Landscapes Officer – 16/6/22** - The proposed route passes through mature broadleaf woodland, using well-defined existing paths for much of the route and closely following the contours. The cross sections indicate that re-grading will form a level path of between 900 and 1500mm wide, with localised cut and fill to minimise disturbance. Where a new path has to be formed, the final route should be agreed on site to avoid direct conflict with key trees. Care should be taken to avoid damaging walls and other landscape features along the route and where necessary walls rebuilt using on-site stone.

ENPA - Farming and Wildlife – No Comment Received  
ENPA - Historic Environment Advisor – No Comment Received  
ENPA - Trees and Woodlands – No Comment Received  
ENPA - ROW and Access Officer – No Comment Received  
Natural England – No Comment Received



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DCC – Highways – No Comment Received  
Oare Parish Meeting – No Comment Received

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### **Representations**

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No public letters of representation have been received.

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### **Policy Context**

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Exmoor National Park Publication Local Plan (2011 - 2031)  
GP1 – General Policy: National Park Purposes and Sustainable Development  
CE-S1 – Landscape and Seascape Character  
CE-D1 – Protecting Exmoor’s Landscapes and Seascapes  
CE-S3 – Biodiversity and Green Infrastructure  
CE-S4 – Cultural Heritage and Historic Environment  
CE-D3 – Conserving heritage Assets  
CE-S6 – Design and Sustainable Construction Principles  
CC-S1 – Climate Change Mitigation and Adaption  
CC-S2 – Coastal Development  
RT-S1 – Recreation and Tourism  
RT-D12 – Public rights of way and access

The National Planning Policy Framework is also a material planning consideration.

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### **Planning Considerations**

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This application seeks permission for the creation of a new, altered route to provide part of the England Coast Path. The proposed development consists of a new path that will be 830m in length and will be between 0.9m and 1.5m in width.

The main planning issues in relation to this application are considered to be the principle of the development and the impact on public rights of way, the impact on the character and appearance of the landscape (including the Heritage Coast), the impact on the historic environment and the impact on protected species and habitats.

#### **PRINCIPLE OF DEVELOPMENT AND IMPACT ON PUBLIC RIGHTS OF WAY**

##### **Background**

On 20 June 2017, Natural England (NE) submitted a report to the Secretary of State for the Environment, Food and Rural Affairs setting out the proposals for improved access to the coast between Minehead and Combe Martin.

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The primary intention of the new coastal access rights is to create more opportunities for the public to enjoy the natural and cultural environment of the coast and to understand it better. NE's approach was to find the best outcome that secures these opportunities whilst ensuring appropriate protection for key sensitive features. This principle is in keeping with NE's statutory purpose to conserve, enhance, and manage the natural environment, and also the National Park purposes. It is also acknowledged that a balance must be struck between the needs of private land owners and benefits to the public.

The creation of a public right of access along the English coast for open-air recreation on foot is provided for by the Marine and Coastal Access Act 2009 (MCA). The Act places a duty on Natural England to secure this access by means of a route and an associated margin of open access land for the public to enjoy.

The route through the National Park falls into one complete stretch of the England Coast Path – Minehead to Combe Martin. For the entire stretch, the South West Coast Path (SWCP) National Trail already exists. For much of the route, this line is proposed to become the England Coast Path as it fully meets the criteria laid down under the MCA Act. Where the current SWCP route does not meet the criteria, a new route is proposed and once the new route is established, the SWCP will also move to follow this new line.

This application seeks to provide a stretch of the trail to replace the existing path which did not meet the criteria under the MCA Act as the existing path is up to  $\frac{3}{4}$  mile inland.

The proposed development consists of a new path that will be 830m in length and will be between 0.9m and 1.5m in width. Approximately 520m of this altered route will follow an existing path. The existing path will need to be widened and levelled. This will be done by using a mini digger in tandem with works carried out by hand. This also includes the re-building of a stone, retaining wall. The remaining 310m has been chosen to fit the contours and avoid steep gradients and mature trees. This section of the path will be created using a cut and fill method with a mini digger and will connect to the main access drive to Glenthorne. No surfacing material is required, and no material will be brought onto site. The agent confirms that no revetment will be required, and the constructed path should be easy to maintain.

Policy RT-D12 of the Local Plan states that the access network will be safeguarded by ensuring that development proposals will not adversely affect a) the condition of the access network, b) users' interests and c) character and appearance.

Paragraph 8.92 of the preamble to this policy states that the access network is a means of sustainable transport and enables popular recreational activities that promote healthier living as advocated by national policy and that planning authorities are encouraged to seek opportunities to provide better facilities for users, such as by linking existing rights of way networks.

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Paragraph 8.96 of the preamble to this policy states that proposals that enhance the network and improve existing routes including the provision of linkages between routes will be encouraged. The proposal seeks to alter an existing route, through re-routing and will not adversely affect the existing rights of way network.

It is considered that the proposed development would improve the condition of the existing right of way and enhance users' interests. It is considered that the proposed development accords with policy RT-D12 of the Local Plan.

Policy RT-S1 of the Local Plan relates to recreation and tourism and clause 1 states that opportunities to provide a high quality, inclusive visitor experience on Exmoor through a diverse range of recreation and tourism facilities that actively enhance the understanding and enjoyment of the National Park's special qualities will be encouraged, where certain criteria are met.

It is considered that the proposed development is compatible with the quiet enjoyment of the National Park. That it provides and contributes to a sustainable future, improves health and wellbeing, does not harm the existing network and is a compatible scale for the location and purpose. This in regard the development complies with Policy RT-S1 of the Local Plan.

Officers consider that the proposed development is acceptable in principle as the proposed, re-routed public right of way safeguards and enhances the existing network (RT-D12) and provides a sustainable form of tourism that allows the quiet enjoyment of the National Parks' special qualities (RT-S1).

### THE IMPACT ON THE CHARACTER AND APPEARANCE OF LANDSCAPE INCLUDING THE HERITAGE COAST

The Site lies within Landscape Character Type B (High Wooded Coast, Combes and Cleaves). This landscape character type is located in the northern part of the National Park and comprises of wooded coastal valleys and wooded cliffs and extends for almost the full east-west length of the Exmoor coast. It is closely associated, both physically and visually, with the adjacent landscape character types comprising high coastal heaths, enclosed farmed hills with commons, low farmed coast and march, open moorland and farmed and settled vale. This is a striking and dramatic landscape of steeply incised wooded valleys and cliffs. This landscape character type consists of six landscape character areas and five seascape character areas. The site also lies within the designated heritage coast area.

Policies CE-S1 and CE-D1 of the Local Plan seek to conserve, enhance, and protect Exmoor's landscapes and seascapes. Policy CE-D1 states that development will be permitted where it can be demonstrated that it is compatible with the conservation and enhancement of Exmoor's landscapes and seascapes.

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Policy CE-S1 of the Local Plan states that development proposals should have regard to, and be appropriate in terms of impact with, the conservation of significant landscape and seascape attributes including Heritage Coast. Policy CE-D1 states that development within Exmoor's Heritage Coast should be appropriate to the coastal location and conserve the undeveloped nature of the coast.

Paragraph 4.17 of the preamble to these policies states that development proposals should retain the character of the predominantly undeveloped nature of the Heritage Coast and are consistent with national purposes. Two of the national purposes identified within this paragraph include conserving, protecting and enhancing the natural beauty of the coasts, their marine flora and fauna, and their heritage features and another states that the needs of agriculture, forestry and fishing and the economic and social needs of the small communities on these coasts will be taken into account.

The proposed development seeks to create, and re-route an existing right of way (that currently forms part of the South West Coast Path) to form part of the England Coast Path. This will consist of approximately 830m of new route through the Glenthorne Estate and will involve the levelling out and cut and fill of the land. The first 520m follows an existing, dis-used path on the estate and the remaining 310m will be a completely new path.

This Authority's Future Landscapes Officer has commented on the application and states "The proposed route passes through mature broadleaf woodland, using well-defined existing paths for much of the route and closely following the contours. The cross sections indicate that re-grading will form a level path of between 900 and 1500mm wide, with localised cut and fill to minimise disturbance. Where a new path has to be formed, the final route should be agreed on site to avoid direct conflict with key trees. Care should be taken to avoid damaging walls and other landscape features along the route and where necessary walls rebuilt using on-site stone". The agent has confirmed that care was taken when deciding the new path to be formed should be sited by (where possible) aligning with the contours of the land and avoiding mature trees. The route proposed as part of this application, and if granted planning permission will be the approved, agreed route.

The proposed re-routed right of way would retain the character and nature of the Heritage Coast. The proposed re-routed path would not increase the risk of coastal erosion. It is considered that the proposed development would not unacceptably harm the Heritage Coast and is appropriate within its coastal location.

It is considered that the development would not have a detrimental impact on the landscape. The development would conserve the landscape and seascape through the use of sensitive siting and materials, and it has an acceptable impact on the character and appearance of the landscape. The proposed development is considered to be acceptable and to comply with policies CE-S1 and CE-D1 of the Local Plan.

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### IMPACT ON HISTORIC ENVIRONMENT

Policy CE-S4 relates to cultural heritage and the historic environment and states that Exmoor National Park's local distinctiveness, cultural heritage, and historic environment, will be conserved and enhanced to ensure that present and future generations can increase their knowledge, awareness and enjoyment of these special qualities and that development proposals affecting heritage assets and their settings, will be considered in a manner appropriate to their significance.

Policy CE-D3 states that development proposals that affect a heritage asset and its setting should demonstrate a) a positive contribution to the setting through sensitive design and siting; b) promote the understanding and enjoyment of the heritage asset and its setting or better reveal its significance and appreciation of the setting; and c) avoid unacceptable adverse effects and cumulative visual effects that would impact on the setting.

The re-routed path lies within entries on the historic environment record; Glenthorne Designed Landscape (MEM24547) and adjacent to Croscombe Linhay (MEM22834) and Whitebloom Linhay (MSO12168).

This Authority's Historic Environment Officer has commented on the application and advises that she acknowledges that the survey work has been carried out and that she is content that no further archaeological recording is required. She also advises that, as per the archaeological report submitted, care will be needed to ensure that areas of repair to stone structures, the materials should match those as existing. A condition should be added to any grant of approval that ensures this is the case.

The proposed development consists of the creation of new track and the alteration of an existing path, approximately 830m in total length and is not considered to cause any unacceptable adverse impact on the character, appearance or setting of the existing designed landscape or Linhays. The distinctiveness, cultural heritage and the historic environment would be conserved in accordance with policies CE-S4 and CE-D3 of the Local Plan.

### IMPACT ON PROTECTED SPECIES AND HABITATS

Policy CE-S3 of the Local Plan relates to biodiversity and green infrastructure and states that the conservation and enhancement of wildlife, habitats and sites of geological interest within the National Park will be given great weight.

This Authority's Wildlife Officer has commented on the application and states that Ecology report submitted alongside the application and the recommendations contained therein are generally satisfactory. Given this she recommends that a suitable condition is added to any grant of planning permission ensuring that the development is carried in accordance with those recommendations. She also

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suggests the inclusion of a condition requiring an ecological walkover survey prior to commencement of the development.

Having regard to the ecological report and recommendations submitted in support of the application, it is considered that, subject to the use of conditions and informatives, the proposal would not harm protected species and priority habitats. Given this the proposed development would comply with policy CE-S3 of the Local Plan and the conservation status of protected species would be conserved.

### OTHER MATTERS

In May 2019 the UK government declared a climate emergency, Exmoor National Park followed this by declaring a Climate Emergency in October 2019. To help meet this challenge the Local plan includes policies which seek to influence, contribute and challenge development to help meet the Climate Emergency. GP1 'Achieving National Park Purposes and Sustainable Development' Sets out that the need to consider future generations, through sustainability and resilience to climate change and adapting to and mitigating the impacts of climate change.

Policy CC-S1 'Climate Change Mitigation and Adaption' states that climate change mitigation will be encouraged, development which reduces demand for energy, using small scale low carbon and renewable energy, looks to situate development which avoids sites that would put wildlife at risk together with measures which avoids the risk of flooding. Furthermore, Policy CC-S5 'Low Carbon and Renewable Energy Development' seeks to support small scale renewable energy schemes that assist in contributing towards reducing greenhouse gas emissions and moving towards a carbon neutral National Park and policy CE-S6 'Design and Sustainable Construction Principles' seeks to incorporate sustainable construction methods which future proof against climate change impacts, including flood risk.

Paragraph 152 of the National Planning Policy Framework requires that "the planning system should support the transition to a low carbon future in a changing climate taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

There could be an impact on the climate from the construction process, but this would be limited given the scale of the development. It is considered that there would not be a material impact on the climate going forward. Officers consider that the impact on the climate resulting from the construction of the proposed development would not be such that a reason for refusal should be given.

Brendon and Countisbury Parish Council have commented on the application and state that they support this application.

## 13.3

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### Human Rights

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The provisions of the Human Rights Act 1998 and Equality Act 2010 have been taken into account in reaching the recommendation contained in this report.

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### Conclusion

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The proposed development consists of a new path that will be 830m in length and will be between 0.9m and 1.5m in width is supported under policies RT-D12 and RT-S1. The proposed development is considered to have an acceptable impact on important wildlife interests, subject to appropriate conditions and there is considered to be no unacceptable impact on the character and appearance of the landscape, the heritage coast or on the historic environment.

On balance, the proposal is considered to comply with the relevant planning policies and it is recommended that planning permission be approved subject to conditions.

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### Recommendation

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Approve subject to the following conditions:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: In accordance with the provisions of Section 91 of the Town and Country Planning Act 1990, (as amended by the Planning and Compulsory Purchase Act 2004).

2. The development hereby approved shall not be carried out except in complete accordance with the drawing numbered by the Authority as 1 – Site Location Plan and date stamped 22 April 2022 and drawings numbered as SAS9392-09 – Proposed Cross Sections, SAS9392-10 – Proposed Plan, Section and Elevation, SAS9392-11 – Proposed Plan and Section, SAS9392-12 – Proposed Elevations, SAS9392-06 – Proposed new footpath route, SAS9392-07 – Proposed Cross Sections and SAS9392-05 – Proposed Cross Sections and date stamped 22 April 2022.

Reason: For the avoidance of doubt and to ensure the works accord with the approved details.

3. Prior to the commencement of the development, hereby approved, an ecological walkover survey, as set out in the Ecological Assessment referred to in Condition 4, shall be submitted to and agreed in writing by the Local Planning Authority. The development shall thereafter be carried out in accordance with any recommendations submitted alongside the walkover survey.

Reason: To ensure the proposal meets the requirements within the National Planning Policy Framework 2021, allowing the development to contribute to and enhance the

## 13.3

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natural and local environment by minimising impacts on and providing net gain for biodiversity, and in accordance with Policy CE-S3 of the Exmoor National Park Local Plan 2011-2031.

4. The development hereby approved, shall be carried out in accordance with the recommendations contained in the Ecological Assessment undertaken by Somerset Ecology Services for Glenthorne between Yenworthy Combe and Handball and dated 03/02/2021, unless otherwise agreed in writing by the Local Planning Authority.

Specifically, to avoid direct impacts to habitats and species which are known to be, or may be present, the development shall be carried out in accordance with the following:

- No trees shall be removed other than those identified within the Arboricultural Appraisal and Tree Appraisal Plan, dated April 2021, prepared by Devon Tree Services and submitted in support of the application.
- No tree, scrub or bracken shall be removed, in accordance with the Arboricultural Appraisal, other than outside of the main breeding season in the period from the 1st September to the 28th February, or if this is not possible, a nesting bird check should be completed by a suitably qualified ecologist/ornithologist, or a Ranger with bird survey experience, in the 24 hour period prior to removal. Any nesting birds discovered will be buffered by a 5 metres exclusion zone which will remain in force until the chicks have fledged.
- Scrub and bracken should initially be reduced to a height of 10 centimetres above ground level, brushings and cuttings removed and the remainder left for a minimum period of 48 hours of fine warm weather before clearing to minimise the risk of harming/killing any reptiles that may be present and to encourage their movement onto adjoining area. This work shall only be undertaken during the period between April and October.
- Any section of dry stone wall, log or stone piles to be removed or modified should be dismantled by hand, allowing reptiles time to escape to safety. In the event that a reptile is found injured, works must stop and a qualified ecologist contacted immediately. If the reptile is in danger of further injury or death, then it may be gently collected using a towel of jumper and placed within a sealed container with air holes and taken to the nearest animal rescue centre. Please note, it is not advised to handle an adder (*Vipera berus*), thus a qualified and experienced ecologist should be contacted in the first instance.
- In the unlikely event that dormice are discovered, works must stop immediately, and a qualified and experienced ecologist contacted for further advice.

Reason: To ensure the proposal meets the requirements within the National Planning Policy Framework 2021, allowing the development to contribute to and enhance the natural and local environment by minimising impacts on and providing net gain for biodiversity, and in accordance with Policy CE-S3 of the Exmoor National Park Local Plan 2011-2031.



## 13.3

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5. All materials to be used for any areas of repair to supporting stone structures or footpath creation shall match those as existing including their style and fabric, unless otherwise agreed in writing by the Local Planning Authority.

Reason: In the interest of cultural heritage and the historic environment in accordance with policies CE-S4 and CE-D3 of the Exmoor National Park Local Plan 2011-2031.

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### **Informatives**

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#### POSITIVE & PROACTIVE STATEMENT

This Authority has a pro-active approach to the delivery of development. Early preapplication engagement is always encouraged. In accordance with the requirements of Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, in determining this application, Exmoor National Park Authority has endeavoured to work positively and proactively with the agent/applicant, in line with the National Planning Policy Framework, to ensure that all relevant planning considerations have been appropriately addressed to achieve a positive outcome.

#### CONDITIONS AND INFORMATIVES

Please check all the conditions and informatives attached to this Decision Notice. If there are any conditions which require submission of details and/or samples prior to work commencing on site it is vital that these are submitted and agreed in writing by the Local Planning Authority before work starts. Given the High Court's interpretation of the Planning Acts and their lawful implementation it is unlikely that the Local Planning Authority will be able to agree to a sample/details after the commencement of works if that sample/details should have been approved prior to commencement. If a sample/detail is not agreed as required prior to commencement and works have started then it is likely that this matter may only be able to be rectified by the submission of another application. To avoid delay, inconvenience and the need to submit a further application, please ensure that all appropriate details/samples are submitted and agreed at the specified time.

Please also note that due to other decisions of the High Court it is now not normally possible for the Local Planning Authority to agree to minor amendments to approved applications. It will be necessary to adopt a formal approach and that if changes to approved plans are proposed then it will be necessary to make a new planning application. Please ensure that works comply with the approved plans so as to avoid the possibility that works are unauthorised and liable for enforcement action.

#### MONITORING OF DEVELOPMENT

The applicant/developer is reminded that it is their responsibility to ensure that the requirements of each planning condition are met and that the works are undertaken in accordance with the approved plans. Any failure to meet the terms of a planning

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condition or work which does not accord with the approved plans leaves the applicant/developer liable to formal action being taken. The National Park Authority endeavours to monitor on site the compliance with conditions and building works. This has benefits for applicants and developers as well as the National Park. To assist with this monitoring of development the applicant/developer is requested to give at least fourteen days notice of the commencement of development to ensure that effective monitoring can be undertaken. The Planning Section can be contacted at Exmoor National Park Authority, Exmoor House, Dulverton, Somerset, TA22 9HL or by telephone on 01398 323665 or by email [plan@exmoor-nationalpark.gov.uk](mailto:plan@exmoor-nationalpark.gov.uk).

### PUBLIC RIGHT OF WAY INFORMATIVE

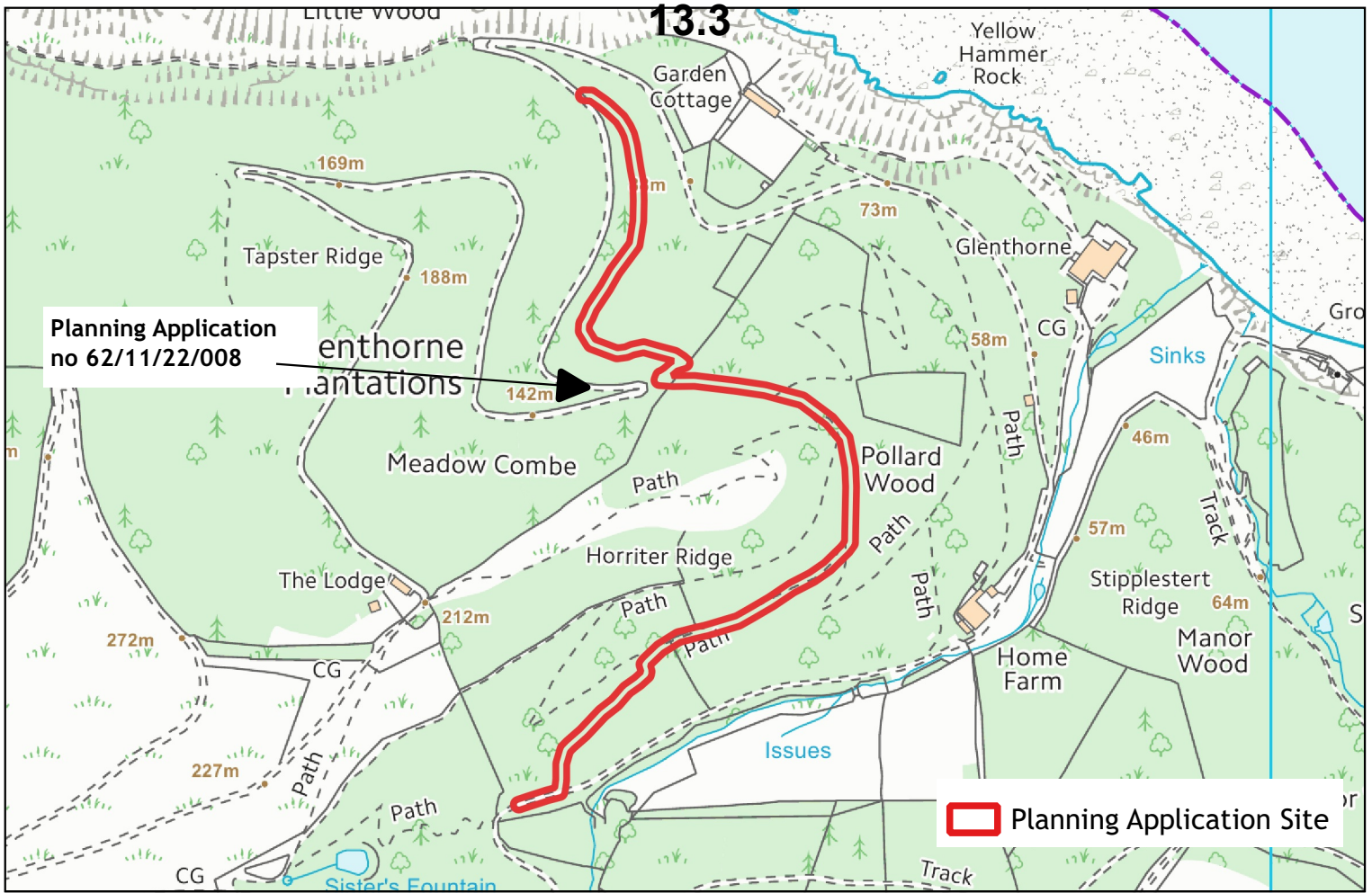
Public rights of way should be open (easy and safe to use) at all times. Please note the following:

- Care should be taken to avoid obstructing or interfering with the public rights of way or creating a hazard for users. If it is impossible to avoid interference or potential danger, the appropriate legal steps (e.g. path closure application) should be taken in advance of any works. If this is likely to be necessary, please contact ENPA (who act on behalf of the Highway Authority) or seek legal advice as soon as possible.
- Any disturbance to the surface of rights of way should be avoided but if any such disturbance does occur due to the owner/occupier or their agents' use of the way, the surface should be reinstated.
- Where planning permission is granted, this does not authorise any person to stop up or divert any public right of way.
- Separate legal steps are needed for this
- The driving of a vehicle is only permitted on a public bridleway/footpath where the driver has lawful authority to do so
- Parking on the public right of way may be deemed to constitute an obstruction
- Changes to the surface/drainage of a public right of way require prior authorisation from the Highway Authority (in this case ENPA as its agent)
- New furniture (e.g. gates) being needed along a public right of way require prior authorisation from the Highway Authority (in this case ENPA as its agent)
- Where an increase in vehicular traffic or other alteration in the private use of a public right of way this route is expected as a result of the development, there will be other considerations such as the impact on the maintenance requirements of the right of way.

### HISTORIC ENVIRONMENT INFORMATIVE

The applicant is reminded that the Historic Environment Team should be consulted if any original surfacing or other features are discovered whilst carrying out the approved development.

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Site Map  
Scale 1:5000

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Overview Map  
Scale 1:20,000

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## 13.3

# 13.4



## Committee Report

Application Number:	62/41/22/023
Registration Date:	28-Apr-2022
Determination Date:	06-Jun-2022
Applicant	Mr B Totterdell
Agent:	Mr. A Elston, Architectural Studio SW Ltd
Case Officer:	Yvonne Dale
Site Address:	Picnic Site and Car Park, Valley of Rocks, Lynton, EX35 6JH
Proposal:	Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for advertisement consent for the proposed installation of 5 no signs (x1 entrance sign, x1 information board, x1 disabled parking sign and x2 payment signage signs). Amended description.
Recommendation:	Approve subject to conditions
Reason for bringing before Authority Committee:	Exmoor National Park Authority is the applicant.

### Relevant History

**62/41/21/019** - Application under Regulation 3 of the Town and Country Planning General Regulations 1992 for proposed alterations to site, including the relocation and replacement of existing car parking machine, installation of a second car parking machine, formation of new parking bays, widening of vehicular entrance track and construction of grass banks.  
Approved 05/10/2021

**62/41/08/003** - Regulation 3 application for Restoration of picnic area located between Lynton – Approved - 02/06/2008

**62/41/76/004** - New track for vehicular access to centre of picnic area – Approved - 03/02/1976

**NE 709** - Proposed use of land as picnic site - Approved - 03/16/1971

### Site Description & Proposal

Advertisement consent is requested for five adverts at the Valley of Rocks Picnic Site. The proposed work includes the installation of a free standing information/display board, a free standing entrance sign, a free standing disabled parking space post/sign

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and two free standing payment machine information boards. None of the proposed signs are illuminated.

The Valley of Rocks is a dramatic and well visited landscape, significant for its rugged and scenic beauty. The application site lies next to the West Exmoor Coast and Woods Site of Special Scientific Interest (SSSI), which is important for its flora and rich bird population. The SSSI also contains important geological features.

The valley includes a Registered Common, which encompasses the north western end of the application site, and a Village Green. There are a number of twentieth century developments that contrast with the wild character of the valley, including two areas of public car parking (the picnic site, owned by ENPA, and the car park owned by Lynton Town Council, which lies further to the east), the road through the valley, mini roundabout, fencing and the cricket pitch.

The site lies within the Heritage Coast. There are a number of public rights of way close to the application site and the picnic site is clearly visible in the valley.

The application site is designated as important open space under the Local Plan – as recreational space.

By way of background in terms of planning status, the site is a former caravan park within a walled enclosure. It would appear that the land became a “picnic site” following a grant of planning permission in 1971 (application ref NE 709). That planning permission brought the “recreational” use of the land, for which the site is designated under the Local Plan. Application ref 62/41/76/004 proposed a “new track for vehicular access to centre of picnic area” and was granted planning permission in 1976. That included some additional parking areas.

Application ref 62/41/08/003 proposed “Regulation 3 application for restoration of picnic area”. The proposal saw the removal of the northern loop road (introduced in the 1970s) to reduce the overall visual impact and to provide a larger informal grass area for public enjoyment. Existing informal parking areas remained and two additional pull-ins were created at the ends of the old loop road, which was removed. The ticket machine was provided/relocated. The proposals were considered to bring a small loss of parking, but a gain in grass recreational area. This application was approved.

The most recent planning application for the site, prior to this proposal, is 62/41/21/019, which proposed “Application under Regulation 3 of the Town and Country Planning General Regulations 1992 for proposed alterations to site, including the relocation and replacement of existing car parking machine, installation of a second car parking machine, formation of new parking bays, widening of vehicular entrance track and construction of grass banks”. This was approved in October 2021.

The permitted use of the land is as a “picnic” site, which is designated as important

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open space under the Local Plan. The site has and does accommodate vehicle parking, which supports its use as recreational space, and that parking was modernised through development approved under application ref 62/41/21/019 towards the end of 2021.

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### Consultee Representations

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**North Devon Council - Planning – 29/04/22 – No Observations**  
**North Devon Council - Planning – 16/6/22 – No Observations**  
**Lynton & Lynmouth Town Council - 12/05/22 – No Objection**  
**DCC – Highways – No Comment Received**  
**ENPA - Farming and Wildlife – No Comment Received**  
**ENPA - Historic Environment Officer – No Comment Received**  
**ENPA - Historic Environment Advisor – No Comment Received**  
**ENPA - Wildlife Conservation Officer – No Comment Received**  
**ENPA - Future Landscapes Officer – No Comment Received**  
**ENPA - ROW and Access Officer – No Comment Received**  
**ENPA - Trees and Woodlands – No Comment Received**  
**ENPA - Wildlife Officer – No Comment Received**  
**Natural England – No Comment Received**

NB At the time of writing this report the consultation period, in relation to the site notice, is live. Any further comments that are received prior to the Authority Committee meeting will be presented verbally and may require further consideration of the recommendation

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### Representations

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No public letters of representation have been received.

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### Policy Context

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The Town and Country Planning (Control of Advertisements) (England) Regulations 2007

Exmoor National Park Local Plan (2011-2031)  
GP1 – General Policy  
CE-S1 Landscape and Seascape Character  
CE-D1 Protecting Exmoor’s Landscapes and Seascapes  
CE-S2 – Protecting Exmoor’s Dark Night Sky  
CE-S4 – Cultural Heritage and Historic Environment  
CE-D3 – Conserving Heritage Assets  
CE-S6 – Design and sustainable construction principles  
CE-D5 – Advertisements and Private Road Signs

The Lynton and Lynmouth Neighbourhood Plan 2013 – 2028

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P1 – Overall objectives for new development

The National Planning Policy Framework (NPPF) is also a material planning consideration.

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### Planning Considerations

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The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 state that a Local Planning Authority shall exercise its powers under these Regulations on the interests of amenity and public safety, taking into account the provisions of the development and other relevant factors. In relation to amenity, this includes the general characteristics of the locality, including the presence of any feature of historic, architectural or similar interest.

Paragraph 136 of the National Planning Policy Framework states that the quality and character of places can suffer when advertisements are poorly sited and designed. Control over the display of advertisements should be operated in a way which is simple, efficient and effective. Advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

Policy CE-D5 of the Local Plan states that “advertisements, and private road signs will only be permitted where it can be demonstrated that in the interest of amenity:

- a) The proposal represents a joint or community advertisement or sign; or the advertisement is located on, or is well related to the building that is used for the business or attraction; and
- b) There will be no adverse individual, cumulative, or sequential impact on landscape character and local distinctiveness of the locality; and
- c) The size, scale, colour and siting are appropriate and the materials and design are of a high standard which conserve or enhance the character and appearance of the area”.

Further to this the policy states that “the proposal should have no detrimental impact on public safety” and that “opportunities to enhance existing buildings or the landscape through consolidating, redesigning or removing existing advertisements/signage will be encouraged”.

It is clear from the above that the key considerations when determining an application for advertisement consent are the impact on the amenities of the area and the impact on public safety and highways from the installation of the proposed signage.

The proposed new signage consists of the installation of five adverts. Advert one is a free standing information board that will be located on the northern side of the public conveniences building, that lies to the north western edge of the proposed site. This sign is constructed of timber with a green overlay with white text laid over the angled board. The sign measures approximately 1.2m at its highest part, the board is



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approximately 1.3m wide and 0.56m tall. The depth of the board is approximately 0.05m. The maximum height of any of the individual letters and symbols is approximately 0.05cm.

Advert two is a free standing entry sign that will be located at the entrance to the car park, lying to the east of the entrance track that lies to the north western edge of the site. This sign is constructed of timber with the letters/wording etched out. The sign measures approximately 1.3m in height, approximately 1.2m wide and has a depth of approximately 0.1m. The text will be black in colour.

Advert 3 is a free standing disabled parking sign that will be located to the south of the public conveniences, in the first parking area, that is located to the western side of the site. The sign will consist of a painted metal sign attached to a timber post. The timber post measures approximately 0.6m in height and 0.1m in width. The painted metal sign will measure 0.3m wide by 0.3m high. The painted metal will have a blue background with the universal disabled symbol in white.

Adverts 4 and 5 are duplicates and are free standing parking payment information signs. They will be located on the south western edges of the site and adjacent to the parking payment machines (the replacement and relocation of the first and the introduction of the second which were approved under application 62/41/21/019). The signs will be constructed of green painted metal with a green overlay with white text. The sign will measure approximately 1.75m high and be approximately 0.8m wide with a depth of approximately 0.1m.

Some amendments have been made to application as the original proposal stated there were 4 proposed signs but the proposed plans showed 5 signs. The agent clarified that the description was incorrect and the application has subsequently been re-consulted on. The re-consultation date expires after the date of the Authority Committee (7<sup>th</sup> July 2022).

Lynton and Lynmouth Town Council have commented on the application and state that they have no objection to the application.

North Devon Council planning department have commented on the application and state that they have no observations.

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### Human Rights

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The provisions of the Human Rights Act 1998 and Equality Act 2010 have been taken into account in reaching the recommendation contained in this report.

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### Conclusion

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Primarily the proposed signs are to be sited next to existing structures except for the disabled parking sign and the entrance sign. The new entrance sign will replace an existing entrance sign in the same location. The base of the disabled parking sign will sit approximately 0.3m above the ground and will be seen in context of the hard surfaced parking area.

It is considered that the proposed signs would not cause harm to the character and appearance of the landscape, the West Exmoor Coast SSSI, the registered common, the village green, the heritage coast, public rights of way or the designated important open space for recreation.

It is also considered that the proposed signs would not cause harm to the amenities of the area or impact unacceptably on public safety and highways. For the reasons outlined above the proposed development is considered acceptable and in accordance with the relevant development plan policies.

At the time of writing the report the consultation period for the application in connection with the site notice is live. Comments that are received prior to the Authority Committee meeting will be verbally reported at the meeting.

Should any adverse comments be received between the committee date of the 5<sup>th</sup> July and the expiration date of the consultation period which is the 7<sup>th</sup> July the application will go back before Members to consider these comments at the August Authority Committee.

It is considered that this approach is acceptable in this instance as no adverse comments, either from statutory consultees or any public letters of representation have been received in relation to the proposal.

In having regard to the above and subject to further comments that may be received and may require further consideration at the Authority meeting, the impacts of the proposed adverts are considered to be acceptable, and the proposal is judged, on balance, to comply with the relevant development plan policies. The recommendation is therefore one of approval subject to appropriate conditions.

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## Recommendation

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Approve subject to the following conditions:

1. The advertisement hereby approved shall be installed strictly in accordance with drawings numbered as 2264.1/200A – Proposed Site Location Plan, 2264.1/201 – Proposed Sign Details and date stamped by the Local Planning Authority on 28 April 2022.

Reason: To ensure a satisfactory standard of advertisement in the interests of amenity.

2. No advertisement is to be displayed without the permission of the owner of the site or any other person with an interest in the site entitled to grant permission.

Reason: Standard condition under the provisions of The Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

3. No advertisement shall be sited or displayed so as to: (a) endanger persons using any highway, railway, waterway, dock, harbour or aerodrome (civil or military); (b) obscure, or hinder the read interpretation of, any traffic sign, railway signal or aid to navigation by water or air; or (c) hinder the operation of any device used for the purpose of security or surveillance or for measuring the speed of any vehicle.

Reason: Standard condition under the provisions of The Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

4. Any advertisement displayed, and any site used for the display of advertisements, shall be maintained in a condition that does not impair the visual amenity of the site.

Reason: Standard condition under the provisions of The Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

5. Where an advertisement is required under these Regulations to be removed, the site shall be left in a condition that does not endanger the public or impair visual amenity.

Reason: Standard condition under the provisions of The Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

6. Any structure or hoarding erected or used principally for the purpose of displaying advertisements shall be maintained in a condition that does not endanger the public.

## 13.4

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Reason: Standard condition under the provisions of The Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

7. Notwithstanding the provisions of the Town & Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting those Orders with or without modification), the advertisements hereby approved shall not be internally or externally illuminated without the prior written consent of the Local Planning Authority. Any consented illumination shall be installed and operated fully in accordance with details agreed with the Local Planning Authority.

Reason: To safeguard the visual amenity, landscape character and dark night sky of the National Park in accordance with Policies GP1, CE-S1, CE-D1, CE-S6 and CE-S2 of the Exmoor National Park Local Plan 2011-2031.

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### **Informatives**

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#### POSITIVE & PROACTIVE STATEMENT

This Authority has a pro-active approach to the delivery of development. Early preapplication engagement is always encouraged. In accordance with the requirements of Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, in determining this application, Exmoor National Park Authority has endeavoured to work positively and proactively with the agent/applicant, in line with the National Planning Policy Framework, to ensure that all relevant planning considerations have been appropriately addressed to achieve a positive outcome.

#### MONITORING OF DEVELOPMENT

The applicant/developer is reminded that it is their responsibility to ensure that the requirements of each planning condition are met and that the works are undertaken in accordance with the approved plans. Any failure to meet the terms of a planning condition or work which does not accord with the approved plans leaves the applicant/developer liable to formal action being taken. The National Park Authority endeavours to monitor on site the compliance with conditions and building works. This has benefits for applicants and developers as well as the National Park. To assist with this monitoring of development the applicant/developer is requested to give at least fourteen days notice of the commencement of development to ensure that effective monitoring can be undertaken. The Planning Section can be contacted at Exmoor National Park Authority, Exmoor House, Dulverton, Somerset, TA22 9HL or by telephone on 01398 323665 or by email [plan@exmoor-nationalpark.gov.uk](mailto:plan@exmoor-nationalpark.gov.uk).

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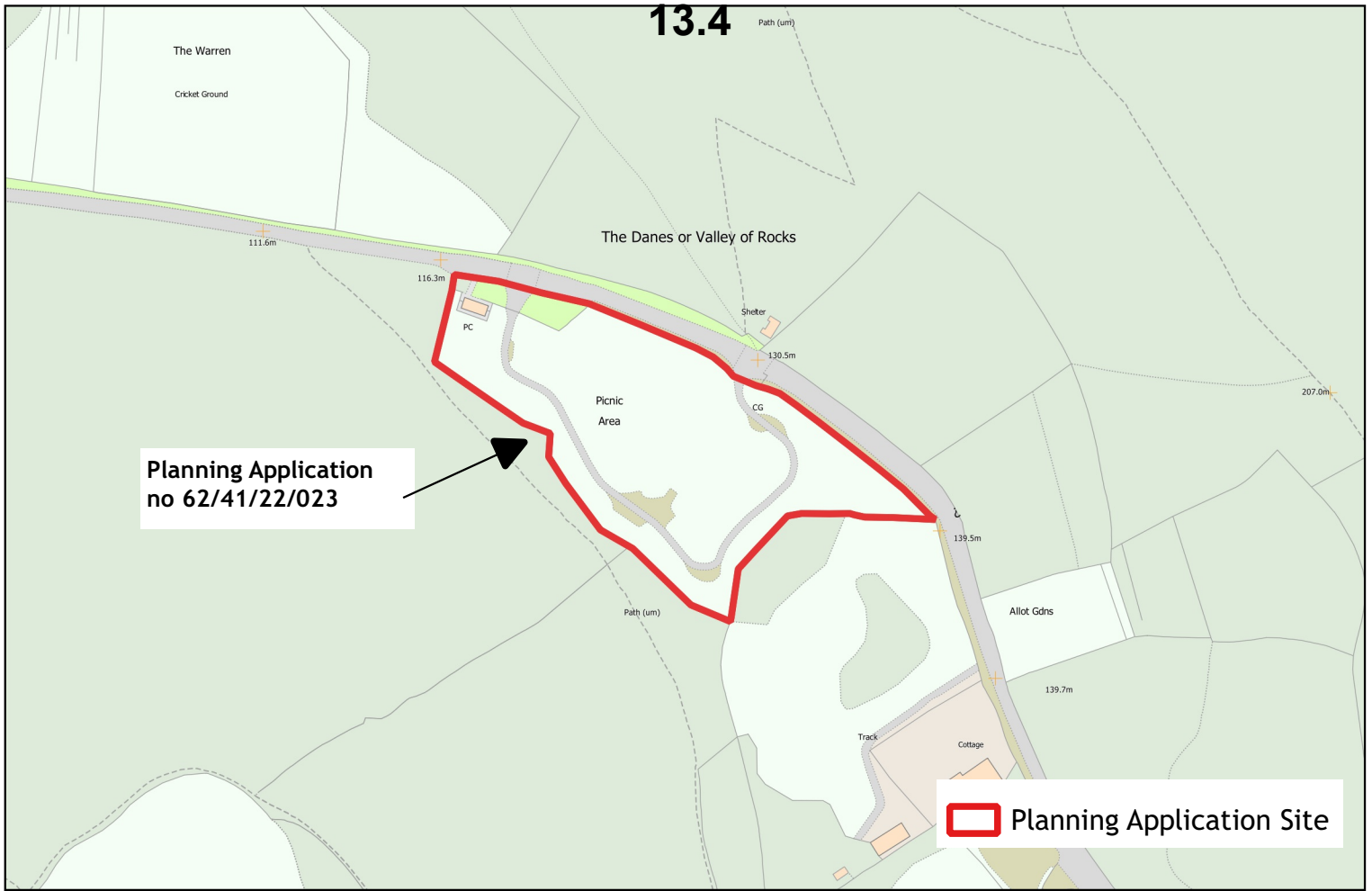
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### CONDITIONS AND INFORMATIVES AND THE SUBMISSION OF FURTHER DETAILS

Please check all the conditions and informatives attached to this Decision Notice. If there are any conditions which require submission of details and/or samples prior to work commencing on site it is vital that these are submitted and agreed in writing by the Local Planning Authority before work starts. Given the High Court's interpretation of the Planning Acts and their lawful implementation it is unlikely that the Local Planning Authority will be able to agree to a sample/details after the commencement of works if that sample/details should have been approved prior to commencement. If a sample/detail is not agreed as required prior to commencement and works have started then it is likely that this matter may only be able to be rectified by the submission of another application. To avoid delay, inconvenience and the need to submit a further application, please ensure that all appropriate details/samples are submitted and agreed at the specified time.

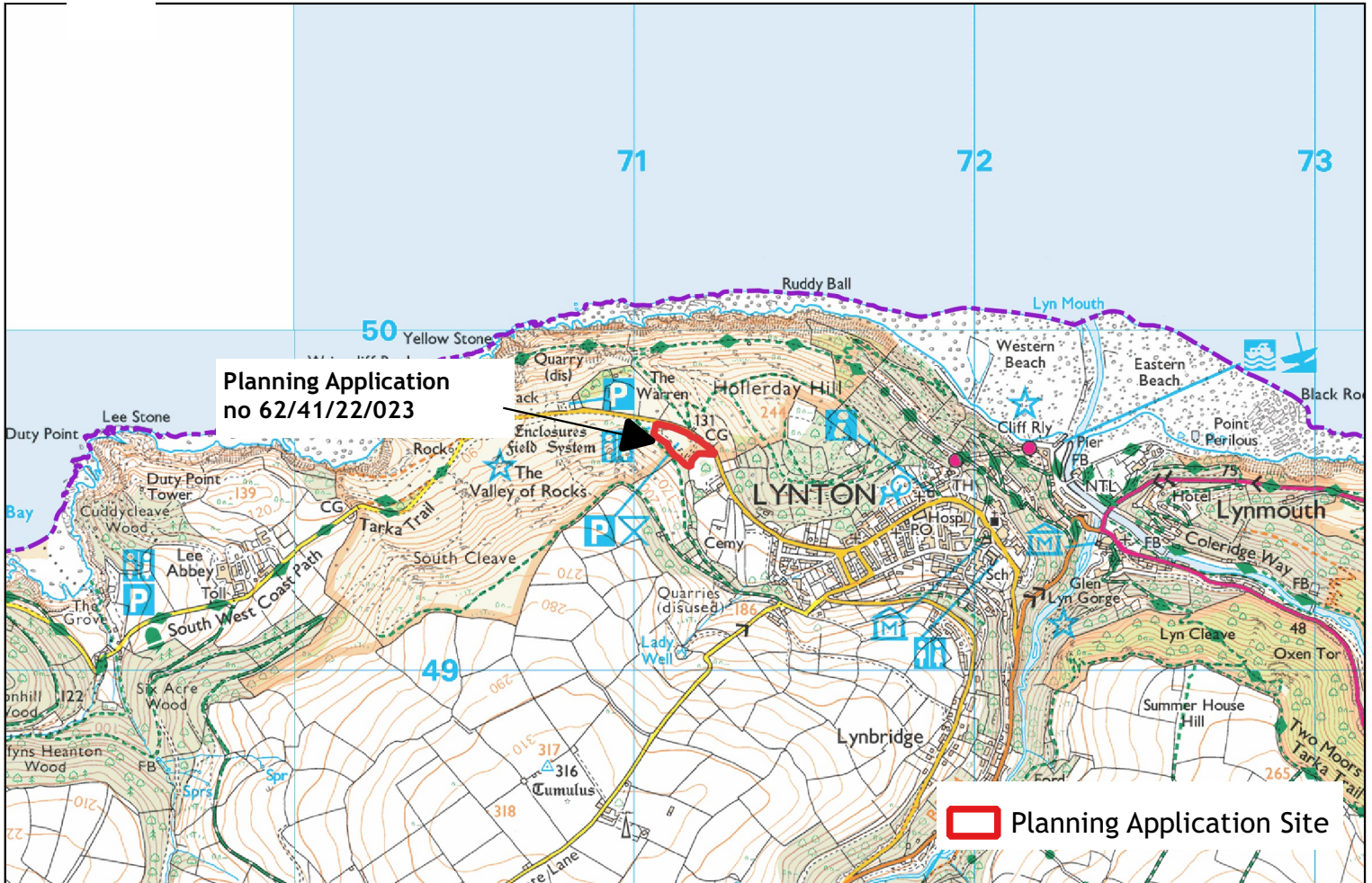
Please also note that due to other decisions of the High Court it is now not normally possible for the Local Planning Authority to agree to minor amendments to approved applications on an informal basis. The Department of Communities and Local Government have introduced a process whereby it is now possible to apply for a non-material amendment to a permission. This can deal with changes to plans which do not fundamentally alter the form of permission but are a variation to the approval. The appropriate form is available by request at Exmoor House or by downloading from the National Park Authority web site. Applications can be made via the Planning Portal.

Please ensure that works comply with the approved plans so as to avoid the possibility that works are unauthorised and liable for enforcement action.



**Site Map**  
Scale 1:2,500

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**Overview Map**  
Scale 1:20,000

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# 13.5



## Committee Report

Application Number:	62/41/22/024
Registration Date:	19-May-2022
Determination Date:	04-Jul-2022
Applicant	Mr D James
Agent:	
Case Officer:	Dean Kinsella
Site Address:	EXMOOR NATIONAL PARK INFORMATION CENTRE, THE ESPLANADE, LYNMOUTH, EX35 6EQ
Proposal:	Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for advertisement consent for the proposed replacement of external and window signage.
Recommendation:	Approve with conditions
Reason for bringing before Authority Committee:	The applicant is Exmoor National Park

### Relevant History

None relevant to this application

### Site Description & Proposal

The application site occupies a prominent location in Lynmouth which is set within a Conservation Area. The area around the harbour area is one of the most frequented parts of the Conservation Area. Just past the quay, Riverside Road turns sharply left into the Esplanade, where there is a small terrace of shops terminating in the Pavilion, lime kilns and cliff railway, with the cliffs right up behind. The Pavilion building is a two storey building with rendered white walls and a slate roof and has been highlighted as a building which contributes positively to the character and appearance of the Conservation Area and forms the focus of this application.

The proposed development seeks advertisement consent to replace the existing signage on the National Park Centre. The proposal includes the use of icons and text on windows and walls, which include:

- near the entrance will include information painted on the side wall which will have a maximum size of 1.45m in height 1.26m wide with the largest character height on the sign being 18cm and these graphics will be coloured black. Graphics on the windows and an information board is also proposed, but the

## 13.5

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board will only be stationed outside when the information centre is open. The information board will measure 85cm height and 60cm width. In the right-hand window of the recessed entrance area is proposed further information which includes centre opening times and an A2 information graphic board. The two boards proposed will be separated by a 17-inch screen which will show images throughout the day.

- window and doors vinyl signs with the logo measuring 70cm in height and 80cm wide with the largest font size measuring 12cm. These graphics will be coloured white.
- relocation of a right angled signed centrally to the shop front, which will measure 45cm by 45cm with a depth of 14cm.
- A replacement A1 board is proposed on the side elevation to allow the Café to promote their business. This board measures 90cm in height and 64cm wide

Within the shop front, shelving, fingerposts, figures, telescopes and graphics are also proposed to promote the National Park which will be changed from time to time subject to the requirements of the centre.

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### Consultee Representations

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**ENPA Historic Buildings Officer** - The building is identified as one which contributes positively to Lynmouth Conservation Area in the existing conservation area appraisal. The proposal involves minor alteration to shop front signage and will have a neutral impact on the conservation area. I support the application.

**North Devon Council** – No Observations

No further comments received

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### Representations

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None received

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### Policy Context

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Exmoor National Park Local Plan 2011 – 2031

GP1 – General Policy: Achieving National Park Purposes and Sustainable Development

CE-S1 – Landscape and Seascape Character

CE-D1 – Protecting Exmoor’s Landscapes and Seascapes

CE-S4 – Cultural Heritage and Historic Environment



## 13.5

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CE-D3 – Conserving Heritage Assets  
CE-S6 – Design and Sustainable Construction Principles  
CE-D5 – Advertisements and Private Road Signs  
RT-D12 – Access Land and Rights of Way  
AC-D2 – Traffic and Road Safety Considerations for Development

The National Planning Policy Framework (NPPF) is also a material planning consideration.

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### Planning Considerations

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The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 state that a Local Planning Authority shall exercise its powers under these Regulations in the interests of amenity and public safety, taking into account the provisions of the development and other relevant factors. In relation to amenity, this includes the general characteristics of the locality, including the presence of any feature of historic, architectural or similar interest.

Paragraph 136 of the National Planning Policy Framework states that the quality and character of places can suffer when advertisements are poorly sited and designed. It is also stated that advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

Policy CE-D5 of the Exmoor National Park Local Plan 2011 – 2031 states that “advertisements, and private road signs will only be permitted where it can be demonstrated that in the interests of amenity:

- a) the proposal represents a joint or community advertisement or sign; or the advertisement is located on, or is well related to the building that is used for the business or attraction; and
- b) there will be no adverse individual, cumulative, or sequential impact on landscape character and local distinctiveness of the locality; and
- c) the size, scale, colour and siting are appropriate, and the materials and design are of a high standard which conserve or enhance the character and appearance of the area”.

Further to this, Policy CE-D5 states that “the proposal should have no detrimental impact on public safety” and that “opportunities to enhance existing buildings or the landscape through consolidating, redesigning or removing existing advertisements / signage will be encouraged”.

It is clear from the above that the key considerations when determining an application for advertisement consent are the impact on amenities of the area and impact on public safety and highways from the installation of the proposed signage and any associated lighting.

## 13.5

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The application site occupies a prominent location in Lynmouth which is set within a Conservation Area. The area around the harbour area is one of the most frequented parts of the Conservation Area. Just past the quay, Riverside Road turns sharply left into the Esplanade, where there is a small terrace of shops terminating in the Pavilion, lime kilns and cliff railway, with the cliffs right up behind. The Pavilion building has been highlighted as a building with contribute positively to the character and appearance of the Conservation Area.

Policy CE-S4 of the Local Plan advises that, among other things, Exmoor National Park's local distinctiveness, cultural heritage, and historic environment, will be conserved and enhanced to ensure that present and future generations can increase their knowledge, awareness, and enjoyment of these special qualities. The Policy advises that development should make a positive contribution to the local distinctiveness of the historic environment and ensure that the character, special interest, integrity, and significance of any affected heritage asset and its setting is conserved and enhanced. Where development proposals are likely to cause significant harm to, or loss of, designated heritage assets or assets of national significance, permission should be refused in accordance with CE-S4.

The Authority's Historic Buildings Officer commented on the application stating that the works proposed would involve only minor alterations to the shop front signage and the Historic Buildings Officer considered that the impact on the Conservation Area will be neutral.

Officers concur with the views of the Conservation Officer and overall, the proposal is considered to comply with policy CE-D4 & CE-D5 of Exmoor Local Plan.

Policy CE-D5 Advertisement and Private Road Signs states that advertisements will only be permitted where it can be demonstrated that in the interests of amenity the proposal the advertisement is located on or is well related to the building that is used for the business or attraction. Furthermore, there will be no adverse individual, cumulative, or sequential impact on landscape character and local distinctiveness of the locality and the size, scale, colour and siting are appropriate, and the materials and design are of a high standard which conserve or enhance the character and appearance of the area.

The signs have also been designed so to not clutter the shop front. The signs to the entrance of the centre have been designed so they recessed from the front of the building and will only be viewable from areas close to the building itself and Illumination is also not proposed. The character of the streetscene is one of a mixture of shops, takeaways, and tourist attractions where sympathetic signage is a common feature. The colour scheme, and the use of graphics directly on the windows and walls, ensures that there is no cumulative detrimental impact on the wider landscape character and the design generally has a neutral impact on the wider landscape.

## 13.5

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Turning to highway safety, the signage will be visible from the Esplanade when approaching either by foot or by vehicle in both directions. However, the sign is clear of the highway so as not to cause obstruction. It is non-illuminated and easily readable such that it is not considered to cause distraction to highway users that would result in potential harm to the existing levels of highway safety.

### **CLIMATE EMERGENCY**

In May 2019 the UK government declared a climate emergency, Exmoor National Park followed this by declaring a Climate Emergency in October 2019. To help meet this challenge the Local plan includes policies which seek to influence, contribute and challenge development to help meet the Climate Emergency. GP1 'Achieving National Park Purposes and Sustainable Development' Sets out that the need to consider future generations, through sustainability and resilience to climate change and adapting to and mitigating the impacts of climate change. Policy CC-S1 'Climate Change Mitigation and Adaption' states that climate change mitigation will be encouraged, development which reduces demand for energy, using small scale low carbon and renewable energy, looks to situate development which avoids sites that would put wildlife at risk together with measures which avoids the risk of flooding. Furthermore, Policy CC-S5 'Low Carbon and Renewable Energy Development' seeks to support small scale renewable energy schemes that assist in contributing towards reducing greenhouse gas emissions and moving towards a carbon neutral National Park and policy CE-S6 'Design and Sustainable Construction Principles' seeks to incorporate sustainable construction methods which future proof against climate change impacts, including flood risk.

Paragraph 152 of the National Planning Policy Framework requires that "the planning system should support the transition to a low carbon future in a changing climate taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

There would be an impact on the climate from the construction process and the sourcing of construction materials. Officers consider that the impact on the climate resulting from the creation and implementation of the adverts would not be such that a reason for refusal should be given.

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### **Human Rights**

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The provisions of the Human Rights Act 1998 and Equality Act 2010 have been taken into account in reaching the recommendation contained in this report.

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### **Conclusion**

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## 13.5

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For the reasons given above the application is recommended that advertisement consent is granted

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### **Recommendation**

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The application is recommended for approval subject to the following conditions:

1. The advertisement hereby approved shall be displayed in accordance with the location plan (File No 1, 2), site plan (File No 3) and File No's 13, 14, 15, 16, 17, 18, 19, 20, 21, 22 & 23.

Reason: For the avoidance of doubt and to ensure the advert is displayed in accordance with the plans/drawings to which this consent relates.

2. No advertisement is to be displayed without the permission of the owner of the site or any other person with an interest in the site entitled to grant permission.

Reason: Standard condition under the provisions of The Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

3. Any advertisement displayed, and any site for the display of advertisement, shall be maintained in a clean and tidy condition to the reasonable satisfaction of the Local Planning Authority.

Reason: In accordance with the Town and Country Planning (Control of Advertisement) (England) Regulations 2007.

4. Any structure or hoarding erected or used principally for the purposes of displaying advertisements shall be maintained in a safe condition.

Reason: In accordance with the Town and Country Planning (Control of Advertisement) (England) Regulations 2007.

5. When the advertisement hereby permitted is required to be removed in accordance with the Town and Country (Control of Advertisement) (England) Regulations 2007, the removal shall be carried out to the reasonable satisfaction of the Local Planning Authority.

Reason: In accordance with the Town and Country Planning (Control of Advertisement) (England) Regulations 2007.

6. No advertisement shall be sited or displayed so as to obscure, or hinder the ready interpretation of, any road traffic sign, railway signal or aid to navigation by water

## 13.5

or air, or so as to otherwise render hazardous the use of any highway, railway, waterway or aerodrome (civil or military).

Reason: In accordance with the Town and Country Planning (Control of Advertisement) (England) Regulations 2007.

7. Notwithstanding the provisions of the Town & Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting those Orders with or without modification), the advertisements hereby approved shall not be internally or externally illuminated without the prior written consent of the Local Planning Authority. Any consented illumination shall be installed and operated fully in accordance with details agreed with the Local Planning Authority.

Reason: To safeguard the visual amenity, landscape character and dark night sky of the National Park in accordance with Policies GP1, CE-S1, CE-D1, CE-S6 and CE-S2 of the Exmoor National Park Local Plan 2011-2031.

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### **Informatives**

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#### **POSITIVE & PROACTIVE STATEMENT**

This Authority has a pro-active approach to the delivery of development. Early pre-application engagement is always encouraged. In accordance with the requirements of Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, in determining this application, Exmoor National Park Authority has endeavoured to work positively and proactively with the agent/applicant, in line with the National Planning Policy Framework, to ensure that all relevant planning considerations have been appropriately addressed to achieve a positive outcome.

#### **MONITORING OF DEVELOPMENT**

The applicant/developer is reminded that it is their responsibility to ensure that the requirements of each planning condition are met and that the works are undertaken in accordance with the approved plans. Any failure to meet the terms of a planning condition or work which does not accord with the approved plans leaves the applicant/developer liable to formal action being taken. The National Park Authority endeavours to monitor on site the compliance with conditions and building works. This has benefits for applicants and developers as well as the National Park. To assist with this monitoring of development the applicant/developer is requested to give at least fourteen days notice of the commencement of development to ensure that effective monitoring can be undertaken. The Planning Section can be contacted at Exmoor National Park Authority, Exmoor House, Dulverton, Somerset, TA22 9HL or by telephone on 01398 323665 or by email [plan@exmoor-nationalpark.gov.uk](mailto:plan@exmoor-nationalpark.gov.uk).

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### **CONDITIONS AND INFORMATIVES AND THE SUBMISSION OF FURTHER DETAILS**

Please check all the conditions and informatives attached to this Decision Notice. If there are any conditions which require submission of details and/or samples prior to work commencing on site it is vital that these are submitted and agreed in writing by the Local Planning Authority before work starts. Given the High Court's interpretation of the Planning Acts and their lawful implementation it is unlikely that the Local Planning Authority will be able to agree to a sample/details after the commencement of works if that sample/details should have been approved prior to commencement. If a sample/detail is not agreed as required prior to commencement and works have started then it is likely that this matter may only be able to be rectified by the submission of another application. To avoid delay, inconvenience and the need to submit a further application, please ensure that all appropriate details/samples are submitted and agreed at the specified time.

Please also note that due to other decisions of the High Court it is now not normally possible for the Local Planning Authority to agree to minor amendments to approved applications on an informal basis. The Department of Communities and Local Government have introduced a process whereby it is now possible to apply for a non-material amendment to a permission. This can deal with changes to plans which do not fundamentally alter the form of permission but are a variation to the approval. The appropriate form is available by request at Exmoor House or by downloading from the National Park Authority web site. Applications can be made via the Planning Portal.

Please ensure that works comply with the approved plans so as to avoid the possibility that works are unauthorised and liable for enforcement action.

Planning Application no 62/41/22/024

Planning Application Site

Site Map

Scale 1:2,500

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Planning Application no 62/41/22/024

Planning Application Site

Overview Map

Scale 1:20,000

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# 13.6



## Committee Report

Application Number:	6/10/22/111
Registration Date:	19-May-2022
Determination Date:	04-Jul-2022
Applicant	Mr D James
Agent:	Mr. H Lyndsay, Lyndsay Design
Case Officer:	Dean Kinsella
Site Address:	EXMOOR NATIONAL PARK INFORMATION CENTRE, DUNSTER STEEP, DUNSTER, MINEHEAD, TA24 6SE
Proposal:	Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for advertisement consent for the proposed replacement of external and window signage.
Recommendation:	Approve with Conditions
Reason for bringing before Authority Committee:	Exmoor National Park are the applicants

### Relevant History

WTCA 21/03 Works to Tree in Conservation Area: Young Ash T1 fell to ground level. - Approved - 05/07/2021

### Site Description & Proposal

The application site lies within the settlement of Dunster along Dunster Steep. The National Park Centre is located within the Conservation Area and occupies a single storey building which has a tiled roof and a mixture of stone, render and timber panelling. The building bounds the A396 which is the main throughfare through the village. To the front of the building is a pedestrianised court area which has a number of other buildings surrounding the tarmacked area.

The proposed development seeks advertisement consent to replace the existing signage on the National Park Centre. The proposal includes:

- Replacement fascia sign measuring approximately 6m wide and 48cm deep with a maximum character height of 25cm and maximum logo height of 30cm.
- the use of icons and text on windows, across the entrance and window and doors to the ground floor front elevation, which include logos which are no greater

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than 60cm wide and 52cm high. In the right-hand window of the recessed entrance area is proposed further information which includes centre opening times and an A2 information graphic board. The two boards proposed will be separated by a 17-inch screen which will show images throughout the day.

Within the shop front, but within 1 metre of the front elevation shelving, fingerposts, figures, telescopes and graphics are also proposed to promote the National Park.

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### Consultee Representations

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**ENPA Historic Buildings Officer** - The building is identified as one which contributes positively to Dunster Conservation Area in the existing conservation area appraisal. The proposal involves minor alteration to shop front signage and will have a neutral impact on the conservation area. I support the application.

**SCC Highways** – No Observations

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### Representations

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None received

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### Policy Context

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Exmoor National Park Local Plan 2011 – 2031

GP1 – General Policy: Achieving National Park Purposes and Sustainable Development

CE-S1 – Landscape and Seascape Character

CE-D1 – Protecting Exmoor’s Landscapes and Seascapes

CE-S4 – Cultural Heritage and Historic Environment

CE-D3 – Conserving Heritage Assets

CE-S6 – Design and Sustainable Construction Principles

CE-D5 – Advertisements and Private Road Signs

RT-D12 – Access Land and Rights of Way

AC-D2 – Traffic and Road Safety Considerations for Development

The National Planning Policy Framework (NPPF) is also a material planning consideration.

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### Planning Considerations

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The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 state that a Local Planning Authority shall exercise its powers under these Regulations in the interests of amenity and public safety, taking into account the provisions of the development and other relevant factors. In relation to amenity, this

## 13.6

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includes the general characteristics of the locality, including the presence of any feature of historic, architectural or similar interest.

Paragraph 132 of the National Planning Policy Framework states that the quality and character of places can suffer when advertisements are poorly sited and designed. It is also stated that advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

Policy CE-D5 of the Exmoor National Park Local Plan 2011 – 2031 states that “advertisements, and private road signs will only be permitted where it can be demonstrated that in the interests of amenity:

- a) the proposal represents a joint or community advertisement or sign; or the advertisement is located on, or is well related to the building that is used for the business or attraction; and
- b) there will be no adverse individual, cumulative, or sequential impact on landscape character and local distinctiveness of the locality; and
- c) the size, scale, colour and siting are appropriate, and the materials and design are of a high standard which conserve or enhance the character and appearance of the area”.

Further to this, Policy CE-D5 states that “the proposal should have no detrimental impact on public safety” and that “opportunities to enhance existing buildings or the landscape through consolidating, redesigning or removing existing advertisements / signage will be encouraged”.

It is clear from the above that the key considerations when determining an application for advertisement consent are the impact on amenities of the area and impact on public safety and highways from the installation of the proposed signage and any associated lighting.

Policy CE-S4 of the Local Plan advises that, among other things, Exmoor National Park’s local distinctiveness, cultural heritage, and historic environment, will be conserved and enhanced to ensure that present and future generations can increase their knowledge, awareness, and enjoyment of these special qualities. The Policy advises that development should make a positive contribution to the local distinctiveness of the historic environment and ensure that the character, special interest, integrity, and significance of any affected heritage asset and its setting is conserved and enhanced. Where development proposals are likely to cause significant harm to, or loss of, designated heritage assets or assets of national significance, permission should be refused in accordance with CE-S4.

The application site, situated on Dunster Steep, occupies a prominent location on the entrance to Dunster which is set within a Conservation Area. The building has been identified as providing a positive impact. The side gable to the National Park Centre, which immediately adjoins the A396 offers a distinct character in this part of the

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Conservation Area. The application site has been highlighted as a building with contribute positively to the character and appearance of the Conservation Area. The proposed signage will update the existing signs on the building and update window displays.

The Authority's Historic Buildings Officer commented on the application stating that the works proposed would involve only minor alterations to the shop front signage and the Historic Buildings Officer considered that the impact on the Conservation Area will be neutral.

Officers concur with the views of the Conservation Officer and overall, the proposal is considered to comply with policy CE-D4 & CE-D5 of Exmoor Local Plan.

Policy CE-D5 Advertisement and Private Road Signs states that advertisements will only be permitted where it can be demonstrated that in the interests of amenity the proposal the advertisement is located on or is well related to the building that is used for the business or attraction. Furthermore, there will be no adverse individual, cumulative, or sequential impact on landscape character and local distinctiveness of the locality and the size, scale, colour and siting are appropriate, and the materials and design are of a high standard which conserve or enhance the character and appearance of the area.

The signs have also been designed so to not clutter the shop front and no new additional signs, beyond vinyl on the windows, are proposed. Illumination is also not proposed. The character of the scene is one of a mixture of shops, takeaways, and tourist attractions. The colours scheme and the use of graphics directly on the windows and walls ensures that there is no cumulative detrimental impact on the wider landscape character.

Turning to highway safety, the signage will be visible from Fore Street when approaching either by foot or by vehicle in both directions. However, the sign is clear of the highway so as not to cause obstruction. It is non-illuminated and easily readable such that it is not considered to cause distraction to highway users that would result in potential harm to the existing levels of highway safety.

### **CLIMATE EMERGENCY**

In May 2019 the UK government declared a climate emergency, Exmoor National Park followed this by declaring a Climate Emergency in October 2019. To help meet this challenge the Local plan includes policies which seek to influence, contribute and challenge development to help meet the Climate Emergency. GP1 'Achieving National Park Purposes and Sustainable Development' Sets out that the need to consider future generations, through sustainability and resilience to climate change and adapting to and mitigating the impacts of climate change. Policy CC-S1 'Climate Change Mitigation and Adaption' states that climate change mitigation will be encouraged, development which reduces demand for energy, using small scale low

## 13.6

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carbon and renewable energy, looks to situate development which avoids sites that would put wildlife at risk together with measures which avoids the risk of flooding. Furthermore, Policy CC-S5 'Low Carbon and Renewable Energy Development' seeks to support small scale renewable energy schemes that assist in contributing towards reducing greenhouse gas emissions and moving towards a carbon neutral National Park and policy CE-S6 'Design and Sustainable Construction Principles' seeks to incorporate sustainable construction methods which future proof against climate change impacts, including flood risk.

Paragraph 152 of the National Planning Policy Framework requires that "the planning system should support the transition to a low carbon future in a changing climate taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

There would be an impact on the climate from the construction process and the sourcing of construction materials. Officers consider that the impact on the climate resulting from the construction of the proposed development would not be such that a reason for refusal should be given.

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### **Human Rights**

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The provisions of the Human Rights Act 1998 and Equality Act 2010 have been taken into account in reaching the recommendation contained in this report.

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### **Conclusion**

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For the reasons given above the application is recommended that advertisement consent is granted.

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### **Recommendation**

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The application is recommended for approval subject to the following conditions:

1. The advertisement hereby approved shall be displayed in accordance with location plan (File No 1 & File No.2), Site Plan (File No.3) and File No.7, File No.8, File No.9 & File No.10 submitted with the application.

Reason: For the avoidance of doubt and to ensure the advert is displayed in accordance with the plans/drawings to which this consent relates.

2. No advertisement is to be displayed without the permission of the owner of the site or any other person with an interest in the site entitled to grant permission.

## 13.6

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Reason: Standard condition under the provisions of The Town and Country Planning (Control of Advertisements) (England) Regulations 2007.

3. Any advertisement displayed, and any site for the display of advertisement, shall be maintained in a clean and tidy condition to the reasonable satisfaction of the Local Planning Authority.

Reason: In accordance with the Town and Country Planning (Control of Advertisement) (England) Regulations 2007.

4. Any structure or hoarding erected or used principally for the purposes of displaying advertisements shall be maintained in a safe condition.

Reason: In accordance with the Town and Country Planning (Control of Advertisement) (England) Regulations 2007.

5. When the advertisement hereby permitted is required to be removed in accordance with the Town and Country (Control of Advertisement) (England) Regulations 2007, the removal shall be carried out to the reasonable satisfaction of the Local Planning Authority.

Reason: In accordance with the Town and Country Planning (Control of Advertisement) (England) Regulations 2007.

6. No advertisement shall be sited or displayed so as to obscure, or hinder the ready interpretation of, any road traffic sign, railway signal or aid to navigation by water or air, or so as to otherwise render hazardous the use of any highway, railway, waterway or aerodrome (civil or military).

Reason: In accordance with the Town and Country Planning (Control of Advertisement) (England) Regulations 2007.

7. Notwithstanding the provisions of the Town & Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting those Orders with or without modification), the advertisements hereby approved shall not be internally or externally illuminated without the prior written consent of the Local Planning Authority. Any consented illumination shall be installed and operated fully in accordance with details agreed with the Local Planning Authority.

Reason: To safeguard the visual amenity, landscape character and dark night sky of the National Park in accordance with Policies GP1, CE-S1, CE-D1, CE-S6 and CE-S2 of the Exmoor National Park Local Plan 2011-2031.

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### **Informatives**

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### **POSITIVE & PROACTIVE STATEMENT**

This Authority has a pro-active approach to the delivery of development. Early pre-application engagement is always encouraged. In accordance with the requirements of Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, in determining this application, Exmoor National Park Authority has endeavoured to work positively and proactively with the agent/applicant, in line with the National Planning Policy Framework, to ensure that all relevant planning considerations have been appropriately addressed to achieve a positive outcome.

### **MONITORING OF DEVELOPMENT**

The applicant/developer is reminded that it is their responsibility to ensure that the requirements of each planning condition are met and that the works are undertaken in accordance with the approved plans. Any failure to meet the terms of a planning condition or work which does not accord with the approved plans leaves the applicant/developer liable to formal action being taken. The National Park Authority endeavours to monitor on site the compliance with conditions and building works. This has benefits for applicants and developers as well as the National Park. To assist with this monitoring of development the applicant/developer is requested to give at least fourteen days notice of the commencement of development to ensure that effective monitoring can be undertaken. The Planning Section can be contacted at Exmoor National Park Authority, Exmoor House, Dulverton, Somerset, TA22 9HL or by telephone on 01398 323665 or by email [plan@exmoor-nationalpark.gov.uk](mailto:plan@exmoor-nationalpark.gov.uk).

### **CONDITIONS AND INFORMATIVES AND THE SUBMISSION OF FURTHER DETAILS**

Please check all the conditions and informatives attached to this Decision Notice. If there are any conditions which require submission of details and/or samples prior to work commencing on site it is vital that these are submitted and agreed in writing by the Local Planning Authority before work starts. Given the High Court's interpretation of the Planning Acts and their lawful implementation it is unlikely that the Local Planning Authority will be able to agree to a sample/details after the commencement of works if that sample/details should have been approved prior to commencement. If a sample/detail is not agreed as required prior to commencement and works have started then it is likely that this matter may only be able to be rectified by the submission of another application. To avoid delay, inconvenience and the need to submit a further application, please ensure that all appropriate details/samples are submitted and agreed at the specified time.

Please also note that due to other decisions of the High Court it is now not normally possible for the Local Planning Authority to agree to minor amendments to approved applications on an informal basis. The Department of Communities and Local Government have introduced a process whereby it is now possible to apply for a non-

## 13.6

material amendment to a permission. This can deal with changes to plans which do not fundamentally alter the form of permission but are a variation to the approval. The appropriate form is available by request at Exmoor House or by downloading from the National Park Authority web site. Applications can be made via the Planning Portal.

Please ensure that works comply with the approved plans so as to avoid the possibility that works are unauthorised and liable for enforcement action.



Planning Application  
no 6/10/22/111

 Planning Application Site

Site Map

Scale 1:2500

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Planning Application  
no 6/10/22/111

 Planning Application Site

Overview Map

Scale 1:20,000

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## 13.6

# 13.7



## Committee Report

Application Number:	6/9/22/104
Registration Date:	18-May-2022
Determination Date:	28-Jun-2022
Applicant	Mr D James
Agent:	Mr. H Lyndsay, Lyndsay Design
Case Officer:	Dean Kinsella
Site Address:	EXMOOR NATIONAL PARK INFORMATION CENTRE, 7-9 FORE STREET, DULVERTON, TA22 9EX
Proposal:	Application under Regulation 3 of the Town & Country Planning General Regulations 1992 for advertisement consent for the proposed replacement of external and window signage.
Recommendation:	Approve with conditions
Reason for bringing before Authority Committee:	The Applicant is Exmoor National Park

### Relevant History

None relevant to this application.

### Site Description & Proposal

The application site lies along the main throughfare, Fore Street, in Dulverton. The site lies in Flood Zone 2 and 3 and in Dulverton Conservation Area. The building forms part of a terrace of properties used for a variety of purposes including an information centre, Food store and butchers.

The proposed development seeks advertisement consent to replace the existing signage on the National Park Centre. The proposal includes:

- Replacement fascia sign measuring approximately 7m wide and 46cm deep with a maximum character height of 14cm.
- the use of icons and text on windows, across the entrance and window and doors to the ground floor front elevation, which include logos which are no greater than 60cm wide and 52cm high. In the left-hand window of the recessed entrance area is proposed further information which includes centre opening times and an A2 information graphic board. The two

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boards proposed will be separated by a 17-inch screen which will show images throughout the day.

Within the shop front, but within 1 metre of the front elevation shelving, fingerposts, figures, telescopes and graphics are also proposed to promote the National Park.

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### Consultee Representations

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**ENPA Historic Buildings Officer** - The building is identified as one which contributes positively to Dulverton Conservation Area in the existing conservation area appraisal. The proposal involves minor alteration to shop front signage and will have a neutral impact on the conservation area. I support the application.

**North Devon Council** – No Observations

**SCC Highways** – Standing Advice

**Dulverton Town Council** – Support the application - Improvements will enhance shop front and hopefully encourage more visitor footfall

No further comments have been received

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### Representations

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None received

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### Policy Context

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Exmoor National Park Local Plan 2011 – 2031

GP1 – General Policy: Achieving National Park Purposes and Sustainable Development

CE-S1 – Landscape and Seascape Character

CE-D1 – Protecting Exmoor’s Landscapes and Seascapes

CE-S4 – Cultural Heritage and Historic Environment

CE-D3 – Conserving Heritage Assets

CE-S6 – Design and Sustainable Construction Principles

CE-D5 – Advertisements and Private Road Signs

RT-D12 – Access Land and Rights of Way

AC-D2 – Traffic and Road Safety Considerations for Development

The National Planning Policy Framework (NPPF) is also a material planning consideration.

# 13.7

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## Planning Considerations

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The Town and Country Planning (Control of Advertisements) (England) Regulations 2007 state that a Local Planning Authority shall exercise its powers under these Regulations in the interests of amenity and public safety, taking into account the provisions of the development and other relevant factors. In relation to amenity, this includes the general characteristics of the locality, including the presence of any feature of historic, architectural or similar interest.

Paragraph 132 of the National Planning Policy Framework states that the quality and character of places can suffer when advertisements are poorly sited and designed. It is also stated that advertisements should be subject to control only in the interests of amenity and public safety, taking account of cumulative impacts.

Policy CE-D5 of the Exmoor National Park Local Plan 2011 – 2031 states that “advertisements, and private road signs will only be permitted where it can be demonstrated that in the interests of amenity:

- a) the proposal represents a joint or community advertisement or sign; or the advertisement is located on, or is well related to the building that is used for the business or attraction; and
- b) there will be no adverse individual, cumulative, or sequential impact on landscape character and local distinctiveness of the locality; and
- c) the size, scale, colour and siting are appropriate, and the materials and design are of a high standard which conserve or enhance the character and appearance of the area”.

Further to this, Policy CE-D5 states that “the proposal should have no detrimental impact on public safety” and that “opportunities to enhance existing buildings or the landscape through consolidating, redesigning or removing existing advertisements / signage will be encouraged”.

It is clear from the above that the key considerations when determining an application for advertisement consent are the impact on amenities of the area and impact on public safety and highways from the installation of the proposed signage and any associated lighting.

The application site, situated on Fore Street, occupies a prominent location in Dulverton which is set within a Conservation Area. The High Street leads up from the leat at its south-west end and splits into two broadly parallel roads, with the northern prong, Fore Street, leading to Bank Square and the Church. The south road continues as the High Street up the hill before turning sharply east into Jury Road and leading out of the historic town. The application site has been highlighted as a building with contribute positively to the character and appearance of the Conservation Area.

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Policy CE-S4 of the Local Plan advises that, among other things, Exmoor National Park's local distinctiveness, cultural heritage, and historic environment, will be conserved and enhanced to ensure that present and future generations can increase their knowledge, awareness, and enjoyment of these special qualities. The Policy advises that development should make a positive contribution to the local distinctiveness of the historic environment and ensure that the character, special interest, integrity, and significance of any affected heritage asset and its setting is conserved and enhanced. Where development proposals are likely to cause significant harm to, or loss of, designated heritage assets or assets of national significance, permission should be refused in accordance with CE-S4.

The Authority's Historic Buildings Officer commented on the application stating that the works proposed would involve only minor alterations to the shop front signage and the Historic Buildings Officer considered that the impact on the Conservation Area will be neutral.

Officers concur with the views of the Conservation Officer and overall, the proposal is considered to comply with policy CE-D4 & CE-D5 of Exmoor Local Plan.

Policy CE-D5 Advertisement and Private Road Signs states that advertisements will only be permitted where it can be demonstrated that in the interests of amenity the proposal the advertisement is located on or is well related to the building that is used for the business or attraction. Furthermore, there will be no adverse individual, cumulative, or sequential impact on landscape character and local distinctiveness of the locality and the size, scale, colour and siting are appropriate, and the materials and design are of a high standard which conserve or enhance the character and appearance of the area.

The signs have also been designed so to not clutter the shop front and no new additional signs, beyond vinyl on the windows, are proposed. Illumination is also not proposed. The character of the scene is one of a mixture of shops, takeaways, and tourist attractions. The colours scheme and the use of graphics directly on the windows and walls ensures that there is no cumulative detrimental impact on the wider landscape character.

Turning to highway safety, the signage will be visible from Fore Street when approaching either by foot or by vehicle in both directions. However, the sign is clear of the highway so as not to cause obstruction. It is non-illuminated and easily readable such that it is not considered to cause distraction to highway users that would result in potential harm to the existing levels of highway safety.

### CLIMATE EMERGENCY

In May 2019 the UK government declared a climate emergency, Exmoor National Park followed this by declaring a Climate Emergency in October 2019. To help meet

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this challenge the Local plan includes policies which seek to influence, contribute and challenge development to help meet the Climate Emergency. GP1 'Achieving National Park Purposes and Sustainable Development' Sets out that the need to consider future generations, through sustainability and resilience to climate change and adapting to and mitigating the impacts of climate change. Policy CC-S1 'Climate Change Mitigation and Adaption' states that climate change mitigation will be encouraged, development which reduces demand for energy, using small scale low carbon and renewable energy, looks to situate development which avoids sites that would put wildlife at risk together with measures which avoids the risk of flooding. Furthermore, Policy CC-S5 'Low Carbon and Renewable Energy Development' seeks to support small scale renewable energy schemes that assist in contributing towards reducing greenhouse gas emissions and moving towards a carbon neutral National Park and policy CE-S6 'Design and Sustainable Construction Principles' seeks to incorporate sustainable construction methods which future proof against climate change impacts, including flood risk.

Paragraph 152 of the National Planning Policy Framework requires that "the planning system should support the transition to a low carbon future in a changing climate taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

There would be an impact on the climate from the construction process and the sourcing of construction materials. Officers consider that the impact on the climate resulting from the construction of the proposed development would not be such that a reason for refusal should be given.

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### **Human Rights**

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The provisions of the Human Rights Act 1998 and Equality Act 2010 have been taken into account in reaching the recommendation contained in this report.

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### **Conclusion**

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For the reasons given above the application is recommended that advertisement consent is granted.

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### **Recommendation**

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The application is recommended for approval subject to the following conditions:

1. The advertisement hereby approved shall be displayed in accordance with location plan (File No 1 & File No.2), Site Plan (File No.3) and File No.6, File No.9, File No. 10 & File No.11 submitted with the application.

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Reason: For the avoidance of doubt and to ensure the advert is displayed in accordance with the plans/drawings to which this consent relates.

2. Any advertisement displayed, and any site for the display of advertisement, shall be maintained in a clean and tidy condition to the reasonable satisfaction of the Local Planning Authority.

Reason: In accordance with the Town and Country Planning (Control of Advertisement) (England) Regulations 2007.

3. Any structure or hoarding erected or used principally for the purposes of displaying advertisements shall be maintained in a safe condition.

Reason: In accordance with the Town and Country Planning (Control of Advertisement) (England) Regulations 2007.

4. When the advertisement hereby permitted is required to be removed in accordance with the Town and Country (Control of Advertisement) (England) Regulations 2007, the removal shall be carried out to the reasonable satisfaction of the Local Planning Authority.

Reason: In accordance with the Town and Country Planning (Control of Advertisement) (England) Regulations 2007.

5. No advertisement shall be sited or displayed so as to obscure, or hinder the ready interpretation of, any road traffic sign, railway signal or aid to navigation by water or air, or so as to otherwise render hazardous the use of any highway, railway, waterway or aerodrome (civil or military).

Reason: In accordance with the Town and Country Planning (Control of Advertisement) (England) Regulations 2007.

6. Notwithstanding the provisions of the Town & Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting those Orders with or without modification), the advertisements hereby approved shall not be internally or externally illuminated without the prior written consent of the Local Planning Authority. Any consented illumination shall be installed and operated fully in accordance with details agreed with the Local Planning Authority.

Reason: To safeguard the visual amenity, landscape character and dark night sky of the National Park in accordance with Policies GP1, CE-S1, CE-D1, CE-S6 and CE-S2 of the Exmoor National Park Local Plan 2011-2031.



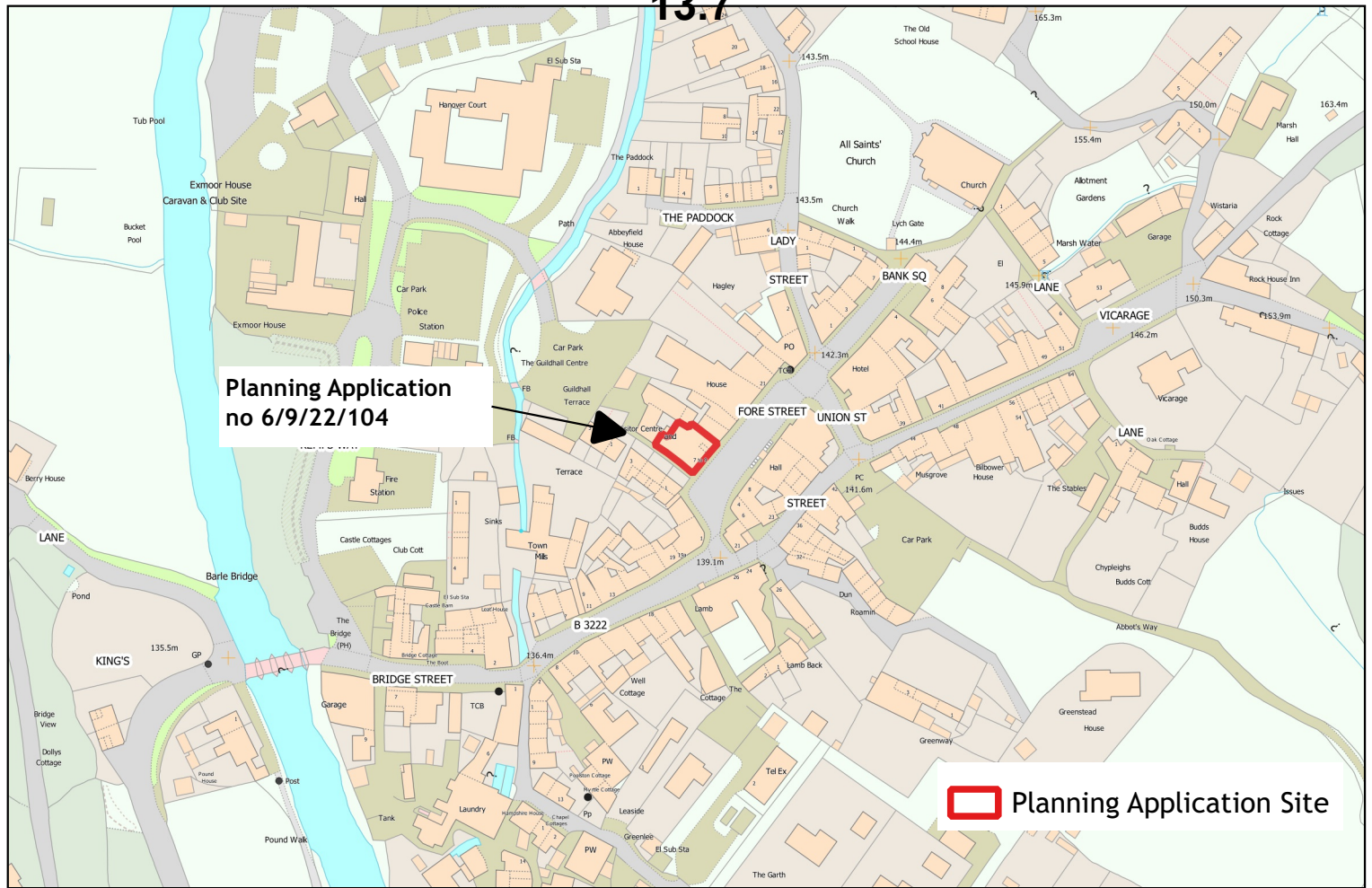
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## **Informatives**

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### **POSITIVE & PROACTIVE STATEMENT**

This Authority has a pro-active approach to the delivery of development. Early pre-application engagement is always encouraged. In accordance with the requirements of Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, in determining this application, Exmoor National Park Authority has endeavoured to work positively and proactively with the agent/applicant, in line with the National Planning Policy Framework, to ensure that all relevant planning considerations have been appropriately addressed to achieve a positive outcome.

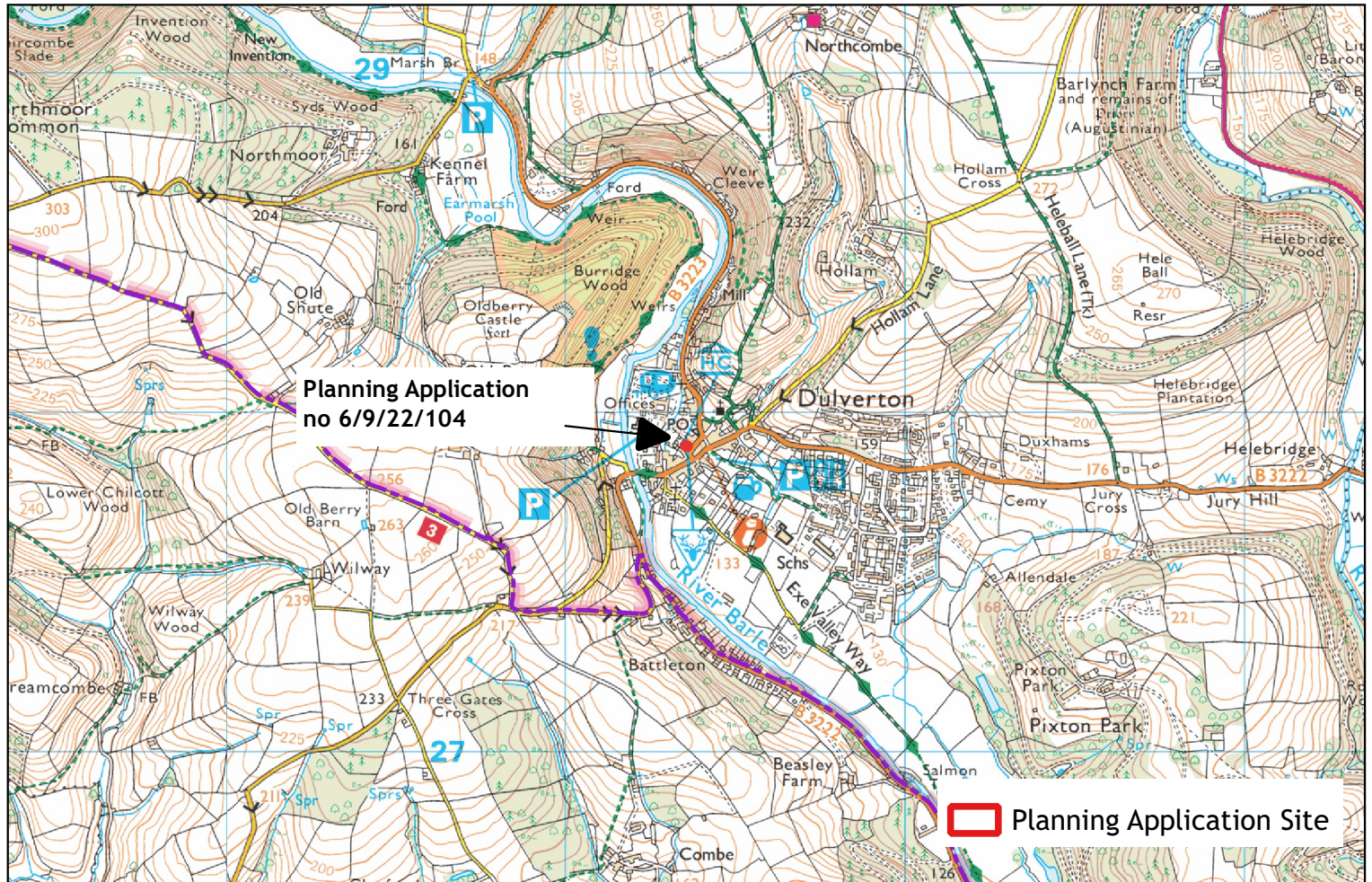


Planning Application no 6/9/22/104

Planning Application Site

Site Map  
Scale 1:2500

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Planning Application no 6/9/22/104

Planning Application Site

Overview Map  
Scale 1:20,000

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**Application decisions delegated to the Chief Executive**

<b>Ref and Grid Ref</b>	<b>Applicant &amp; Location</b>	<b>Decision and Date</b>
GDO 22/09	Mr B Riddle - Prior notification for the proposed creation of agricultural/forestry track (976m x 3m) (GDO - Agricultural/Forestry ) - Tabor Hill Farm, Heasley Mill, South Molton, EX36 3LQ	Prior Approval Required 21-Jun-2022
GDO 22/08	Mr & Mrs P Turner - Prior notification for the erection of agricultural storage building (13.1m x 9.3m) (GDO - Agricultural/Forestry ) - KINGS FARM, WITHYPOOL, MINEHEAD, TA24 7RE	GDO - Prior Approval Not Reqd 16-Jun-2022
6/43/22/108	Mr D Preston & Mrs A Bamford - Proposed Variation of Condition 2 of approved application 6/43/21/104 to remove stone buttresses, reduce area of stone cladding and increase area of timber cladding on elevations, re-align the external walls, amend roof overhang and replace offset and split-level ridge with a single central ridge on roof (amended description). (Alteration/Lift Condition ) - RIDGEWOOD COTTAGE, WOOTTON COURTENAY, MINEHEAD, TA24 8RF	Approved with Conditions 14-Jun-2022
WTPO 22/02	Mr Cranston - Works to trees subject to a tree preservation order: G22 group of 3 Sessile Oaks and 1 Common Sycamore, reduction in height to the previous pruning points circa 2 metres using hand pruning saws with cuts no more than 75mm in diameter and 1 Wild Cherry, reduction in height by 1.5 metres only; T21 Sessile Oak, reduction in height to the previous pruning points circa 2 metres using hand pruning saws with cuts no more than 75mm in diameter. (WTPO ) - COUNTISBURY LODGE, TORS PARK, LYNMOUTH, EX35 6NB	Approved 09-Jun-2022
6/20/22/104	Keni Lee - Proposed erection of a single storey outbuilding side extension. Retrospective. (Householder ) - HIGHER PONDS, LUXBOROUGH, WATCHET, TA23 0SN	Approved with Conditions 20-Jun-2022
62/50/22/005	Mr Mike Hall - Lawful development certificate for the existing use of former Agricultural workshop to be used as domestic storage and home-office space. (CLEUD ) - HEALE MOOR FARM, PARRACOMBE, BARNSTAPLE, EX31 4QE	Approved 15-Jun-2022

**Application decisions delegated to the Chief Executive**

<b>Ref and Grid Ref</b>	<b>Applicant &amp; Location</b>	<b>Decision and Date</b>
6/20/22/103LB	Mr & Mrs Shuffrey - Listed Building Consent for the proposed conversion of garage into ancillary accommodation, to include demolition of flat roof and replace with pitched roof. (Listed Building Consent ) - HOLYWELL COTTAGE, LUXBOROUGH, WATCHET, TA23 0SJ	Approved with Conditions 31-May-2022
6/20/22/102	Mr & Mrs Shuffrey - Proposed conversion of garage into ancillary accommodation, to include demolition of flat roof and replace with pitched roof. (Householder ) - HOLYWELL COTTAGE, LUXBOROUGH, WATCHET, TA23 0SJ	Approved with Conditions 31-May-2022
6/43/22/106	Mr & Mrs P and R Griffin - Lawful development certificate for the existing use of former barn as self contained dwelling, of the 'forge' as residential purposes ancillary to attached dwelling and use of former agricultural land as domestic garden. (CLEUD ) - FORGE COTTAGE, WOOTTON COURTENAY, MINEHEAD, TA24 8RE	Approved 26-May-2022
6/13/22/104	M Colwill - Proposed erection of agricultural mixed-use building - covered silage pit, handling area and livestock housing (20.2m x 18.2m) (Full ) - Combe Farm, EXFORD, MINEHEAD, TA24 7QQ	Approved with Conditions 14-Jun-2022
6/43/22/101	Mr & Mrs C Walker-Blair - Proposed construction of residential dwelling and removal of residential mobile home. (Part Retrospective). (Full ) - APPLIEDORE, HUNTSCOTT, WOOTTON COURTENAY, MINEHEAD, TA24 8RR	Approved with Conditions 17-Jun-2022
6/34/20/103	Mrs P Disney - Lawful development certificate for the existing use of dwelling in breach of Agricultural Occupancy Condition. Resubmission of refused application 6/34/19/108. (CLEUD ) - Avill Nurseries, The Bungalow, Knowle Lane, Timberscombe, TA24 6TX	Approved 07-Jun-2022
62/50/19/013	P Mr, P, Miles - Proposed conversion of stables to one Local Needs Affordable dwelling. (Full ) - Rowley Moor Farm, Parracombe, Devon	Approved with Conditions 20-Jun-2022